

EXHIBIT 2, Part 2

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

* * * * *

BENEZET CONSULTING, LLC	*	
and TRENTON POOL,	*	
Plaintiffs	*	Case No.
vs.	*	1:16-CV-0074
PEDRO A. CORTES and	*	
JONATHAN MARKS,	*	
Defendants	*	

* * * * *

CONTINUED DEPOSITION OF
TRENTON POOL
September 28, 2016

ORIGINAL

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DEPOSITION

OF

TRENTON POOL, taken on behalf of the Defendants herein, pursuant to the Rules of Civil Procedure, taken before me, the undersigned, Bernadette Black, a Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania, at the Office of Attorney General, Strawberry Square, 15th Floor, Harrisburg, Pennsylvania, on Wednesday, September 28, 2016 beginning at 9:14 a.m.

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P R O C E E D I N G S

TRENTON POOL, HAVING FIRST BEEN DULY SWORN, TESTIFIED
AS FOLLOWS:

A. Y'all get the flash drive?

ATTORNEY JOEL:

Yeah.

A. On that flash drive, just so y'all know, I put the
answers. I put the file that has all the deadlines.

ATTORNEY JOEL:

Okay.

A. It's kind of our master file. So that can guide
us through where we want --- basically. It's just by
the deadline, every state that I gave you all that we
did. And then there's a folder called W --- or
Pennsylvania Independent Petitioning, and in that has
every person's W-9 and contract and turn-in stuff, you
know, all that good stuff, proprietary information.
And then also on top of that I have a list of everyone
who worked the Open PGH drive.

ATTORNEY JOEL:

Okay.

A. And then all the rest of the discovery.

ATTORNEY JOEL:

1 Okay. Great.

2 EXAMINATION

3 BY ATTORNEY JOEL:

4 Q. So a couple of follow-ups before we get to that
5 stuff. Yesterday, you used the term when you were
6 talking about how much Alex Aresano --- Arsenault's a
7 Massachusetts partner. Is he a partner or anything in
8 Benezet?

9 A. He's a partner on the Rocky De La Fuente stuff.

10 Q. And what does that mean?

11 A. Well that has changed or resigned, but initially
12 it was me and him were going to split all the profit
13 from everything we did for Rocky.

14 Q. And by that, you mean Benezet and his company was
15 going to split that profit?

16 A. Yes. It was going to be a joint venture,
17 basically.

18 Q. Was that ever formalized?

19 A. It was formalized, but it's no longer --- it's
20 been disavowed. So he is --- and the reason for it was
21 because, you know, his workload has now become about
22 ten percent of what we ended finishing, totally
23 concluding.

24 Q. Okay. So if I understand you correctly, you were
25 going to go into --- you went into a joint venture with

1 him to collect for Rocky in Pennsylvania?

2 A. Yeah. And actually I don't think it was
3 formalized. We were riding the joint venture and Kara
4 probably never sent it to him because of all the
5 issues. We started calculating how many stakes I was
6 doing versus him. I was doing like 75 percent to 25
7 percent, so it didn't make sense. We re-discussed it,
8 and Alex was like look, just let me make the money off
9 the stakes I'm doing in the Northeast, you do the stuff
10 you're doing in the rest of the country.

11 Q. Okay.

12 A. That was still --- I still call him my partner
13 because everything is, you know, transparent. He knows
14 everything that is going on, I know everything that is
15 going on with what they're doing. I'll actually
16 probably be working for him in couple of days.

17 Q. Where's that going to happen?

18 A. In Maine.

19 Q. In Maine?

20 A. Yeah.

21 Q. And what's that job?

22 A. I just talked to him about it. I'm not sure yet.
23 Paula probably knows more than I do. It's a referendum
24 petition for a casino that's going in in Maine.

25 Q. So is Benezet going to get hired or is that going

1 to be Trenton Pool just helping out?

2 A. I'll be going up there just as a petitioner.

3 Q. So just you as a petitioner, Trenton Pool?

4 A. Yeah. I'll be one of like 30 people. Back at the
5 bottom of the totem pole. They have an in-state
6 witness requirement. Imagine that.

7 Q. They do?

8 A. Yes, they do. I'm going to be challenging it.
9 It's one of the 30 states --- 20 states.

10 ATTORNEY ROSSI:

11 Twenty (20).

12 A. No, it's more than that. I have a list.

13 BY ATTORNEY JOEL:

14 Q. Well let's talk about that. How many states, to
15 your understanding, have an instate witness
16 requirement?

17 A. In state. It depends because they switch up.
18 Like some states, like Vermont has no --- or no, you
19 mean instate circularly requirement?

20 Q. Yes.

21 A. There's like four or five.

22 Q. Do you know which ones they are?

23 A. New York, Maine, you guys and I don't know,
24 there's one more out there.

25 ATTORNEY ROSSI:

1 New Jersey.

2 A. There's New Jersey and Delaware; right?

3 ATTORNEY ROSSI:

4 No, not Delaware. I'm not testifying.

5 A. It is new Jersey. I know it is New Jersey.

6 That's the fourth.

7 BY ATTORNEY JOEL:

8 Q. Okay.

9 A. And there's probably one more.

10 ATTORNEY JOEL:

11 There's some work in that Missouri at
12 some level has an instate registration and many states
13 apply ---.

14 A. South Dakota.

15 ATTORNEY ROSSI:

16 Yeah. South Dakota does, absolutely.

17 ATTORNEY JOEL:

18 Okay.

19 ATTORNEY ROSSI:

20 Many states also apply the instate
21 registration sometimes to the --- to the referendum
22 petitions but not to election petitions.

23 A. Yeah.

24 ATTORNEY ROSSI:

25 The referendum petitions, I don't think

1 there is a possible list because some states allow
2 referendum petitions at the local level and they have a
3 rule, so they just pop up as they come along. That's a
4 pretty --- more difficult list to possibly get.

5 A. And if you get to like Texas, they actually have
6 cities that require you to be an in state city voter
7 --- or an in city voter, which is unconstitutional too.
8 But they don't ---.

9 BY ATTORNEY JOEL:

10 Q. So certain Texas cities also have an in city
11 requirement?

12 A. They have an in city requirement, yeah. It's
13 ridiculous.

14 Q. And the states you just listed, New York, Maine,
15 Pennsylvania, New Jersey and South Dakota have in state
16 witness requirements for candidates ---

17 A. That's correct.

18 Q. --- to collect signatures for candidates?

19 A. Oh for candidates? I've never circulated for a
20 candidate in Maine but I know the other four do, yeah.

21 Q. Okay.

22 ATTORNEY ROSSI:

23 I think the Maine restriction is limited
24 to referendum, not election petitions.

25 BY ATTORNEY JOEL:

1 Q. So when you're talking about instate, New York,
2 Maine, Pennsylvania, New Jersey and South Dakota have
3 instate circulator requirements for everything? With
4 the exception that Maine, to your understanding, is not
5 for candidates, just for referendums?

6 A. I'm almost positive that's what it is.

7 Q. You started talking about notaries. What states
8 are you aware of that have notary requirements?

9 A. I think all except for what's on this list, which
10 is about 33. Now when I say that, every state is
11 different. Like Vermont, the independents need a
12 notarization, but the major parties don't.

13 Q. Okay.

14 A. Yeah.

15 Q. Vermont?

16 A. Vermont, yeah. So some states do that. Like if
17 I'm circulating a referendum in Arkansas, I have a
18 notarization. But if I'm circulating an election
19 petition, I don't. Same with New Mexico.

20 Q. So what list do you have there?

21 A. You want me to read it?

22 Q. Yeah.

23 A. These are the states that don't have a
24 notarization.

25 Q. At all? For any signature collecting activity?

1 A. No. Just for presidential.

2 Q. For presidential, okay. So the list you are about
3 to read are states that do not have a notarization
4 requirement for presidential signature gathering?

5 A. That's right.

6 Q. Okay. Go ahead.

7 A. New Mexico, Arkansas, Iowa, Indiana, Tennessee.
8 New Mexico --- I can give you a copy.

9 Q. We're going to mark it afterwards.

10 A. New Mexico, Arkansas, Iowa, Indiana, Tennessee,
11 Massachusetts, Rhode Island actually does. New
12 Hampshire, Utah, Mississippi, Alabama, Florida,
13 Minnesota, Wisconsin, North Dakota, California and
14 Washington State, and then there's also Alaska. And I
15 know there's probably another five to ten.

16 Q. That have no notarization requirement for any
17 collection?

18 A. For presidential ---.

19 Q. For presidential, I'm sorry. And the other states
20 that you didn't mention have presidential signature
21 gathering having notarization requirements; to your
22 understanding?

23 A. I can't speak to everyone. But I know that a
24 majority of them are.

25 ATTORNEY JOEL:

1 Can we mark that as whatever the next one
2 is?

3 (Deposition Exhibit 17 marked for
4 identification).

5 ATTORNEY ROSSI:

6 Trent, did you cross off the ---?

7 BY ATTORNEY JOEL:

8 Q. So everything that remains on that list are states
9 at the presidential level that do not have notarization
10 requirements; is that correct?

11 A. Yeah. But there's probably, like I said, five to
12 ten more states

13 Q. Okay. I see the exhibit list.

14 A. There's probably five to ten more states that
15 don't. That's just a list that I was able to put
16 through my brain last night. I didn't get everyone.
17 And we definitely didn't circulate in every state this
18 summer either, so.

19 Q. So I want to talk about Open Pittsburgh a little
20 bit.

21 A. Okay.

22 Q. Who did you deploy to Open Pittsburgh to collect
23 those signatures?

24 A. I have a list of 25 right here.

25 Q. Go ahead and read them please.

1 A. Angela Dixon, Burt Amos ---.

2 Q. Read slowly please so I can write them down.

3 A. Burt Amos, A-M-O-S.

4 Q. And is it B-E-R-T or B-U-R-T?

5 A. B-U-R-T. Bob Baskin, B-A-S-K-I-N.

6 Q. Denise Mason?

7 A. Ed Mason, Elizabeth Hastings, George Harper, H-A-
8 R-P-E-R, Gerald Bundy, Gersena, G-E-R-S-E-N-A, Guiton,
9 G-U-I-T-O-N, Gregory Waxman, Jasmine Walton, Jeffery
10 King, Jimmy Clark, Joe Jackson, Ken McKnight, Malcom
11 Newman, Michael Jennings, Mildred Almeida, A-L-M-E-I-D-
12 A, Nadaziah, N-A-D-Z-I-A-H, Varner, V-A-R-N-E-R, Sarah
13 Butler, Kathy Adams was supposed to be on that list
14 too. Shaun Sachs.

15 Q. Can you spell that?

16 A. S-H-A-U-N S-A-C-H-S.

17 Q. S-A-C-H-S.

18 A. Yeah. Sheri Smith, Tenisha Greer, Timothy Hale,
19 Victor Bernard-Childres and Walt Stuart.

20 Q. What are the states of residence of all those
21 folks?

22 A. I wouldn't even know that.

23 Q. Do you know any of them?

24 A. Yeah, a few.

25 Q. We know the Masons are both from Pennsylvania.

1 A. Yeah, Gerald Bundy too.

2 Q. And we know Gerald Bundy is from Pennsylvania.

3 A. Greg Waxman is Pennsylvania. He was the --- Greg
4 Waxman, Michael Jennings, I don't know where he's from,
5 Sweden. Tim Hale is Ohio. Sheri Smith is his better
6 half.

7 Q. So she's from Ohio also?

8 A. Yeah. I'm assuming. And then --- Tenisha Greer,
9 Sarah Butler, Elizabeth Hastings, Jimmy Clark are all
10 Ohio.

11 Q. Okay. So Ohio, Tenisha Greer, Ohio. Sarah
12 Butler, Ohio. And who is the other one? Christina?

13 A. No. It was Elizabeth Hastings and Jimmy Clark and
14 Joe Jackson. And the rest are just, you know, through
15 the grapevine people that just came in.

16 Q. For how many days did you collect signatures as
17 --- strike that.

18 Did you collect signatures in Pennsylvania, north
19 of Pittsburgh?

20 A. Me?

21 Q. Yes.

22 A. No, I did now.

23 Q. How many days were these folks deployed in
24 Pennsylvania to collect signatures for the Open
25 Pittsburgh initiative?

1 A. All in all about three days.

2 Q. And do you know how many signatures these folks
3 gathered?

4 A. Close to 6,000 a little bit over.

5 Q. And is your understanding that all these
6 signatures were notarized as required by Pennsylvania
7 law?

8 A. I oversaw the notarization. Now did they all do
9 it when I was in the room? I'm assuming they did.

10 Q. So when you oversaw, what did you do?

11 A. I explained to them all to get their Decs filled
12 out accordingly, their declarations. Be ready to go
13 with a notary. We had one notary which was a big pain.
14 And we waited in assembly line fashion to go --- I
15 had them staggered at different times to come show up
16 so that we didn't all show up at 7:00 p.m. I told a
17 group, you know, come at 7:00, you come at 7:20, you
18 come at so and so forth. Try to make it quicker on her
19 and on us, and yeah. The one change that we made on
20 the --- yeah, that's it. We did exactly what we were
21 told to do.

22 Q. And there was one notary that took care of all
23 that? All 6,000 signatures?

24 A. I think there ended up being a couple different
25 notaries being used. I'm not a hundred percent. I

1 wasn't really --- that wasn't really my job. I was
2 just making sure she was a notary, that they were
3 notaries.

4 Q. Did it take place --- I understand it's staggered,
5 but was it in one day?

6 A. Yes it was, unfortunately.

7 Q. And did Benezet pay for any of that notarization
8 work?

9 A. No. Well he gave me money to pay for it, but I
10 didn't pay for it.

11 Q. Who gave you money?

12 A. Dave. He was like this is for the notary and just
13 like left it with me. I was like okay.

14 Q. So Tessator ---

15 A. I think he had to go somewhere, I don't know.

16 Q. --- gave you money?

17 A. Yeah.

18 Q. Did he give you cash?

19 A. Yeah. It was a cash notarization deal.

20 Q. How much did he give you?

21 A. I can't remember, man, I didn't count it.

22 Q. Did you turn that over to the notary?

23 A. Yeah, of course. It was her money. I'm sure it
24 wasn't a lot.

25 Q. The guy was paid directly by Tessator.

1 A. Exactly.

2 Q. It wasn't paid by Benezet and Benezet getting
3 reimbursed for it?

4 A. No, it wasn't.

5 Q. And what did you --- can you remind me, what did
6 you charge Open Pittsburgh for signature?

7 A. Four bucks.

8 Q. And am I also correct in that the signatures that
9 were gathered --- either when they were gathering or at
10 some point anyway, the intent was not to have somebody
11 sign more than one petition?

12 A. More than one petition?

13 Q. Yes.

14 A. What does that mean? What do you mean? Like
15 duplicating, like sign --- you're holding the petition
16 and then I'm going to go sign his and his and his?

17 Q. Correct.

18 A. Oh yeah, of course. Did that happen? Yeah, I'm
19 sure it did.

20 Q. What did you pay each of your workers for
21 signatures?

22 A. Three bucks. Pretty fair price.

23 Q. The folks who were out collecting signatures on
24 the Open Pittsburgh job, did they work in teams at all
25 or did they all work independently?

1 A. They were all independent. I mean they all are
2 independent contractors. So what they did is up to
3 them.

4 Q. And just to make sure, I think you said this
5 yesterday, but since you just mentioned it, I'll
6 confirm it. All the folks who --- that have had
7 deploys on any job since its inception have all been
8 independent contractors?

9 A. 100 percent.

10 Q. Am I correct then that as an independent
11 contractor when they're not doing a job for Benezet,
12 they could do a job for Alex Arsenal corporation?

13 A. Hundred percent, yes.

14 Q. They could do a job for any other number of ---
15 let me finish the question --- signature collecting
16 companies?

17 A. That's right.

18 Q. Or they could go out and just collect on their
19 own, if they were so inclined?

20 A. They could.

21 Q. Let's talk about Benezet's efforts for Rocky De La
22 Fuente as an independent candidate?

23 A. Okay.

24 Q. And yesterday you told me the states you did.

25 A. Okay.

1 Q. One of things I want you to try to do is what is
2 the sequencing of those dates?

3 A. So I gave you all of that file. But basically, we
4 started in Pennsylvania ---.

5 Q. And when --- let's do it like this, when did you
6 start in Pennsylvania?

7 A. Late June.

8 Q. When were you contracted by Rocky to start doing
9 the work?

10 A. Mid-June.

11 Q. So you --- Benezet received the contract, entered
12 into the contract with the Rocky De La Fuente campaign
13 in mid-June of 2016?

14 A. Yeah.

15 Q. So then beginning in late June ---?

16 A. We're doing Pennsylvania.

17 Q. Do you know who you deployed to Pennsylvania?

18 A. No. That list is in your discovery.

19 Q. And the list that you provided, does it break it
20 down who was at each state or is it just ---?

21 A. There's no way that I would be able to do that
22 without, you know --- you'd have to wait until after
23 probably the tax season I think. It's pretty ---.

24 Q. Fair enough. So how long --- strike that.
25 Understanding ---.

1 A. I have coordinators --- just so you understand
2 what I'm saying. I have coordinators that bring people
3 in. I don't even know half the people that are working
4 there. I'll put one person in charge and then just
5 start sending names. I mean I go through five, six
6 batteries a day just sending people to a state. I'll
7 say call this guy, I don't know if he shows up. I'm
8 just writing checks, that's my job.

9 Q. Who is the coordinator in Pennsylvania?

10 A. I'm basically the coordinator. But I have a
11 coordinator in Philly named Greg Waxman. So the
12 Philadelphia people, 90 percent of them I got off the
13 internet. And then I brought in some pros.

14 Q. When you say brought in off the internet, what do
15 you mean?

16 A. The Craigslist people. The people responding to
17 the Craigslist ads.

18 Q. And is that for witnesses or for circulators or
19 for both?

20 A. For circulators. They're independent. If they're
21 independent, you don't need witnesses.

22 Q. Were they Pennsylvania residents?

23 A. Yeah, most of them. Not all of them, but most of
24 them.

25 Q. So just to make sure I understand you, you put out

1 a request on Craigslist for people to come in and
2 circulate in Philadelphia and you had ---?

3 A. We did every city. We did Pittsburgh, Philly and
4 Penn State even, Erie. Wherever we could get the ads
5 and get people interested.

6 Q. All right. So you --- so let's just make this a
7 little more global then. Benezet put out requests on
8 Craigslist in various places throughout the
9 Commonwealth advertising and asking for folks to sign
10 up and become circulators for Rocky De La Fuente as an
11 independent candidate?

12 A. Yeah. We called them campaign workers. We didn't
13 really go into details of what the job was. We just
14 used that as a kind of general, you know, name and then
15 you saw who was interested. I would screen them.
16 Eventually I had Kara start screening them too, just to
17 make sure they weren't crazies, because a lot of them
18 are. And then if they seem like a good match, we are
19 actually going to try to train them and ---.

20 Q. So you got responses, you combed through that.
21 You make a decision on who to engage as an independent
22 contractor, you trained them; correct?

23 A. Uh-huh (yes).

24 Q. Say yes or no.

25 A. Yes, sir.

1 Q. You then deployed them to these various cities and
2 areas in Pennsylvania?

3 A. I didn't deploy anyone. They were independent
4 contractors so they got the signatures however best -
5 -- you know, I trained them how to get them and told
6 them --- gave them a break down. Went and watched them
7 in the field for 30 minutes or an hour, and if they
8 were doing well, I told them okay, call me when you're
9 --- we'll turn in next week.

10 Q. And a lot of the folks who responded for the
11 Pennsylvania job were Pennsylvania residents?

12 A. A lot of them.

13 Q. Can you give me a sense? Is it 75 percent, 90
14 percent?

15 A. I'd say probably 90.

16 Q. All right.

17 A. They didn't --- the Craigslist people ended up
18 doing, you know, less than ten percent of the work. I
19 mean I spent so much time training and trying to get
20 these people onboard and it was really not even worth
21 my time. I could have spent that same amount of time
22 and opportunity cost of me managing and making money to
23 just being pros. But I was waiting on a verdict from
24 you guys to know how many signatures I had to get.

25 Q. How long were Benezet's folks in Pennsylvania

1 collecting signatures? If they started in late June,
2 when did they end?

3 A. Up until the deadline. We were collecting pretty
4 much until the 29th, 30th of July.

5 Q. And did the deadline --- or wasn't this year
6 anyway August 1?

7 A. Yes, sir.

8 Q. And I think you told me the other day it was about
9 12,000 signatures or 11,000 signatures you got?

10 A. Yeah. It was probably over 12,000 signatures.

11 Q. After Pennsylvania, where did Benezet go next?

12 A. We went to Ohio.

13 Q. And when did you begin in Ohio?

14 A. The 2nd or 3rd.

15 Q. Of August?

16 A. Yeah.

17 Q. And how long was Benezet collecting for Rocky De
18 La Fuente in Ohio?

19 A. Until the 10th.

20 Q. Was that their deadline?

21 A. Yeah.

22 Q. And how many independent contractors did Benezet
23 have in Ohio collecting signatures?

24 A. Probably 30, I couldn't give you the total number.
25 I brought in some people from Pennsylvania but then

1 also from Ohio had a lot of people.

2 Q. Did you have to do a Craigslist advertising
3 or ---?

4 A. I didn't do any of that. After Pennsylvania, that
5 ended. We didn't have time.

6 Q. How many signatures were collected in Ohio?

7 A. Close to 9,000.

8 Q. And can you tell me who collected in Ohio?

9 A. I wouldn't --- I mean, it's going to be a lot of
10 the Open Pittsburgh people.

11 Q. Were a lot of the Open Pittsburgh people also ones
12 who collected for Rocky in Pennsylvania or no?

13 A. Not very many.

14 Q. Okay.

15 A. Ohio has initiative referenda, so it helps
16 sourcing petitioners there. It's always easier to get
17 circulators in states like that.

18 Q. Why is that?

19 A. Just because everyone, you know, is a part-time
20 petitioner in those states. They have familiarity with
21 it. They're asked to sign petitions all the time. SO
22 I was able to source quite a few people that had pretty
23 decent track records.

24 Q. Getting back to Pennsylvania for a second. You
25 said that you were a coordinator and Greg Waxman, any

1 others?

2 A. I mean I appointed Greg Waxman to coordinate. He
3 was pretty --- he seemed to be pretty good at --- he
4 was a good petitioner, he was a good trainer. I
5 oversaw him training and I asked him if he wanted to
6 make a small override so I didn't have to take a train
7 to Philly every week. And he would just do the turn-
8 ins and I would send the money. And he was the only
9 coordinator because I just needed one on the west and
10 one on the east.

11 Q. And how much did Benezet charge the Rocky campaign
12 for the signatures in Pennsylvania?

13 A. Four dollars and 50 cents.

14 Q. And how much did Benezet pay its independent
15 contractors per signature?

16 A. It varied. Going from \$2.00 up to, you know
17 towards the end, I think we ended up paying \$3.50. We
18 probably averaged about \$3.00.

19 Q. In Ohio what did Benezet charge the De La Fuente
20 campaign for signatures?

21 A. Three dollars.

22 Q. And what did you pay the independent contractors?

23 A. I pretty much did it at cost. I didn't make any
24 money there. The coordinator that I contracted to do
25 Rocky skipped town with about \$5,000. So originally I

1 wasn't going to go in there at all. He stopped
2 answering his phone on August 1st and we had to go in
3 there. It's unfortunate.

4 Q. Where did Benezet go for Rocky after Ohio?

5 A. We went to Open Pittsburgh. Came back here.

6 Q. We talked about Open Pittsburgh.

7 A. Yeah. A lot of those guys from Open Pittsburgh
8 came from Ohio, like I said. I mean there's going to
9 be some new ones too that came in just for that.
10 They're on their way down. Alex Arsenault was done, so
11 people were coming through to California, there was
12 stuff going on. Probably like five guys stopped.

13 Q. Where did Benezet go to collect signatures after
14 Open Pittsburgh?

15 A. I think it was Alabama.

16 Q. And this is for Rocky De La Fuente?

17 A. Yeah. All this was for Rocky.

18 Q. Let me ask you, was there any --- I'm sorry, let
19 me ask it this way. When did you --- who did Benezet
20 go into Alabama?

21 A. I don't know the exact date, but I know we had the
22 same week long to get the 10,000 signatures. I don't
23 know what I'd do with myself if I had more time. I
24 think the deadline was the 23rd of August.

25 Q. And in what you provided today on the flash drive,

1 does that have the start dates and end dates for all
2 these various things?

3 A. It didn't have a start date. I mean the start
4 date is whenever the --- you can start petitioning, I
5 think, whatever the legislature says.

6 Q. How many independent contractors did Benezet put
7 on the ground in Alabama?

8 A. The same, about 30.

9 Q. And what did Benezet charge the De La Fuente
10 campaign for signatures?

11 A. It was \$3.00, no \$3.50. And I paid \$3.00.

12 Q. And you said that you got about 10,000 signatures
13 in Alabama?

14 A. Yeah. Something around there. We actually got
15 qualified. We got on the ballot and everything was
16 good.

17 Q. Where did Benezet go to collect for Rocky De La
18 Fuente after Alabama?

19 A. I had a lot of stuff going on, so we had --- I had
20 to go back. I think I had to go to Washington and turn
21 in there. My people went elsewhere. Sent some to
22 Mississippi, sent some to Virginia. You know, we had a
23 lot of things going on at once.

24 Q. Let me ask you that. When you were in --- when
25 Benezet was in Pennsylvania collecting signatures, did

1 you or Benezet have people in other states collecting
2 signatures?

3 A. Of course. So these are my --- these are people
4 that I'm kind of overseeing. But I've also got, so
5 I've got this little farm going. But I also have, you
6 know, a coordinator knocking out, you know, South
7 Dakota, Wyoming, Montana, Washington simultaneously.
8 I've got another guy knocking our Wisconsin. So you
9 know, it's like a --- and then Alex Arsenault, he's
10 doing all this stuff in the Northeast. So we've got a
11 lot of stuff all kind of happening at the same time.

12 Q. So I was a bit confused and that's very helpful.
13 I was understanding that your entire operation was in
14 Pennsylvania and then it all went to Ohio, ---

15 A. No.

16 Q. --- then it all went back to Pennsylvania, then it
17 went to Alabama, but you're saying that's not right?

18 A. No. That is right. It's not my entire operation
19 though.

20 Q. That's what I want to know. Is the entire
21 operation for Benezet --- you listed a whole bunch of
22 states the other day where Benezet collected for Rocky
23 De La Fuente?

24 A. Correct.

25 Q. And what I want to know is what time frames you

1 were in each state. And if there's overlap, that's
2 fine.

3 A. There is overlap, but I mean that's like a ---
4 that would be a --- I would have to go back and
5 reconstruct the whole summer. I can't do that in one
6 night.

7 Q. Let me see if --- let me do this. Let me read to
8 you the states that you provided yesterday, if there
9 are other ones, you can add them and we'll go from
10 there. So what you provided yesterday for collecting
11 --- Benezet collecting on behalf of the Rocky De La
12 Fuente campaign was Massachusetts, Connecticut, New
13 Hampshire ---

14 A. Yes.

15 Q. New Hampshire?

16 A. Yes.

17 Q. Rhode Island?

18 A. Yes.

19 Q. New York?

20 A. Yes.

21 Q. Georgia?

22 A. New York, take that off.

23 Q. Not New York?

24 A. I collected some, but Derek did lead the majority.

25 Q. Was Derek Lee working through Benezet?

1 A. He is working directly for Rocky.

2 Q. Okay. So let's start over again to make sure were
3 clear. Massachusetts?

4 A. Yep.

5 Q. Connecticut?

6 A. Yep.

7 Q. New Hampshire?

8 A. Yep.

9 Q. Rhode Island?

10 A. Let's make it easy, maybe. Can we --- every state
11 that Alex Arsenault did, I'll just take off my list,
12 how about that. Does that make sense?

13 Q. Why do you want to do that?

14 A. Well because --- I mean if I'm not ---. I don't
15 know, I just think that that makes more sense. I am
16 technically collecting there but I'm not really
17 collecting there. That's why I'm doing this.

18 Q. I understand he may be overseeing, he may be
19 managing that. But as I understand, these were places
20 that Benezet collected, where Benezet was the
21 contractor and collecting for Rocky De La Fuente?

22 A. Yes. Can I ask him a question? Off the record?

23 Q. Yes, sure.

24 OFF RECORD DISCUSSION

25 BY ATTORNEY JOEL:

1 Q. Did Benezet --- let's just go one by one on these
2 states. Did Benezet employ any independent contractors
3 in Massachusetts to collect for Rocky as an
4 independent?

5 A. Yes.

6 Q. Over what time frame did Benezet employ those
7 independent contractors?

8 A. I had Alex Arsenault handling it. I can't answer
9 the question.

10 Q. So you don't know what timeframe it was?

11 A. I know that their deadline was August 1st too.

12 Q. So is it fair then that Benezet had independent
13 contractors in Massachusetts beginning some point in
14 the summer of 2016 --- beginning after mid-June when
15 Benezet got the contract with Rocky De La Fuente until
16 August 1st, which was the deadline for Massachusetts
17 signature collections?

18 A. Yes.

19 Q. We'll get at it that way then. For Connecticut,
20 did Benezet have independent contractors in the State
21 of Connecticut between mid-June and whatever their
22 deadline was collecting signatures?

23 A. Yes.

24 Q. And do you know what the Connecticut deadline was?

25 A. The 10th of August.

1 Q. In New Hampshire, do you know what the deadline
2 was for collecting signatures?

3 A. I believe the 15th of August.

4 Q. Did Benezet have people --- independent
5 contractors in the State of New Hampshire between ---.

6 A. Sorry, the New Hampshire deadline is the 7th of
7 September.

8 Q. Okay. So did Benezet have people, independent
9 contractors in the State of New Hampshire collecting
10 signatures for Rocky De La Fuente at some point in time
11 between when the contract was entered with Rocky, which
12 was mid-June, and New Hampshire's deadline which was
13 September 7th?

14 A. Yes.

15 Q. Rhode Island, what was the deadline for Rhode
16 Island?

17 A. September 9th.

18 Q. Did Benezet consulting have independent contracts
19 in the State of Rhode Island collecting signatures for
20 Rocky De La Fuente as an independent candidate for
21 president at some point in time between mid-June when
22 he got the contract and Rhode Island's deadline?

23 A. No, because Alex was now completely in charge of
24 that state.

25 Q. New York, I had written down originally.

1 A. Yeah.

2 Q. Did Benezet consulting have independent
3 contractors in the State of New York in any point of
4 time from mid-June when you got the contract with Rocky
5 De La Fuente and what New York's deadline is?

6 A. No.

7 Q. Do you know when New York's deadline is?

8 A. I believe it's like early August, the 10th --- 2nd
9 to the 10th, somewhere around there.

10 Q. Georgia, do you know when their deadline is?

11 A. The 12th of July.

12 Q. Did Benezet Consulting have independent
13 contractors in the State of Georgia between mid-June
14 when you got the contract with Rocky De La Fuente and
15 the July 12th deadline collecting signatures for Rocky?

16 A. Yes, but I did not have the contract with Rocky
17 for Georgia.

18 Q. Did you charge Rocky for signatures you got in
19 Georgia?

20 A. I have not.

21 Q. Do you collect signatures?

22 A. Yes, we do.

23 Q. No, I mean you, Trenton Pool.

24 A. I did collect.

25 Q. So you collected signatures in Georgia for Rocky

1 De La Fuente, are you planning on invoicing Rocky for
2 those signatures?

3 A. No.

4 Q. Why not?

5 A. We didn't end up turning them in.

6 Q. Oh okay. Why didn't you turn them in?

7 A. Derek decided to not wait for us. So we just ---
8 I'm going to eat them basically, part of Mr. Witmer's
9 943.

10 Q. Pennsylvania we talked about. Didn't --- Ohio we
11 talked about. When's Ohio's deadline again?

12 A. The 10th.

13 Q. Of August?

14 A. Of August.

15 Q. So Benezet Consulting had independent contractors
16 in the State of Ohio collecting signatures for Rocky De
17 La Fuente as an independent candidate for president
18 between mid-June when Benezet got the contract and
19 August 10th, which was Ohio's deadline?

20 A. Yeah.

21 Q. South Dakota, what's their deadline?

22 A. I can't remember.

23 Q. Did Benezet have ---?

24 A. I think it's the 1st, I think it is the 1st. No
25 it's the 2nd of August.

1 Q. 2nd of August?

2 A. 2nd of August.

3 Q. Did Rocky --- did Benezet have independent
4 contractors in the State of South Dakota collecting
5 signatures for Rocky De La Fuente as an independent ---

6 A. Yes.

7 Q. --- candidate for president --- let me finish ---
8 between mid-June when you got the contract with Rocky
9 and August 2nd, which was their deadline?

10 A. Yes.

11 Q. North Dakota, what's their deadline?

12 A. The 9th of September --- 5th of September.

13 Q. Did Benezet Consulting have independent
14 contractors in the State of North Dakota collecting
15 signatures for Rocky De La Fuente as an independent
16 candidate for president between mid-June when you got
17 the contract and September 5th, which was North
18 Dakota's deadline?

19 A. Yes.

20 Q. Wyoming, what's their deadline?

21 A. Their deadline is the 29th of August.

22 Q. Did Benezet consulting have independent contracts
23 in the State of Wyoming collecting signatures for Rocky
24 De La Fuente as an independent candidate president
25 during the time frame of mid-June when you got the

1 contract with Rocky through August 29th, which was
2 their deadline?

3 A. Yes.

4 Q. Montana, what's their deadline?

5 A. The ---.

6 ATTORNEY ROSSI:

7 Would it be helpful if you got to look at
8 a calendar?

9 A. Yes.

10 ATTORNEY ROSSI:

11 Would that be okay, Ken?

12 ATTORNEY JOEL:

13 Sure.

14 A. Can I pull up the email --- that Rocky thing?

15 ATTORNEY ROSSI:

16 Ask Ken.

17 A. Is it okay if I pull up the form that I sent you
18 guys? It's just Richard Weimer's little state by state
19 deadline.

20 BY ATTORNEY JOEL:

21 Q. Yeah. That's fine.

22 A. You'll have it in the flash drive. I think it's
23 the 23rd.

24 Q. Of August?

25 A. Yeah. Let me check.

1 ATTORNEY JOEL:

2 Richard Winger is a ballot access to
3 e-print the publication, Ballot Access News. He has
4 charts and lists of all the respective state deadlines
5 and stuff. And they're pretty accurate.

6 A. Here's one I read about that case.

7 BY ATTORNEY JOEL:

8 Q. So did Benezet Consulting have independent
9 contractors in the State of Montana collecting
10 signatures for Rocky De La Fuente as an independent
11 candidate for president from June --- mid-June when you
12 got the contract with Rocky through Montana's deadline?

13 A. Yes.

14 Q. California, do you know what their deadline is?

15 A. No, I can't remember.

16 Q. Regardless of what the deadline is, did Benezet
17 Consulting have independent contractors in the State of
18 California collecting signatures for Rocky De La Fuente
19 as an independent candidate for president from mid-June
20 when Benezet got the contract with Rocky through
21 whatever California's deadline was?

22 A. Yes.

23 Q. Alaska, do you know what their deadline is?

24 A. August 10th.

25 Q. Did Benezet Consulting have independent

1 contractors in the State of Alaska collecting
2 signatures for Rocky De La Fuente between mid-June of
3 2016 and Alaska's deadline of August 10th, 2016?

4 A. Yes.

5 Q. Washington State, what's their deadline?

6 A. I think it's the 23rd of July.

7 Q. Did Benezet Consulting have independent
8 contractors in the State of Washington collecting
9 signatures for Rocky De La Fuente from mid-June of 2016
10 through August 23rd, which is their deadline?

11 A. Yes. No, it's July 23rd.

12 Q. Oh, I'm sorry. You had independent contractors in
13 the State of Washington collecting signatures for Rocky
14 De La Fuente from mid-June 2016 through July 23rd,
15 which was Washington's deadline?

16 A. Yeah. But we didn't really start until the first
17 week of July, second week of July. Actually, I think
18 we started the 15th of July.

19 Q. New Mexico, you know what their deadline is?

20 A. It's the 7th of June. No, I'm sorry, the 30th of
21 June.

22 Q. Did Benezet Consulting have independent
23 contractors in the State of New Mexico gathering
24 signatures for Rocky De La Fuente from the time, mid-
25 June 2016 when you got the contract with Rocky through

1 June 30th, which was New Mexico's deadline?

2 A. Yes.

3 Q. Wisconsin, what's their deadline?

4 A. I can't remember. Sometime in --- I can't find
5 Rich Winger's little form but sometime in July.

6 Q. Did Benezet Consulting have independent
7 contractors in the State of Wisconsin collecting
8 signatures for Rocky De La Fuente as an independent
9 candidate for president from mid-June ---?

10 A. Actually, no, it's in August.

11 Q. Did Benezet Consulting have independent
12 contractors in the State of Wisconsin collecting
13 signatures for Rocky De La Fuente as an independent
14 candidate for president from mid-June through their
15 deadline, mid-August?

16 A. Yes.

17 Q. Virginia, you know their deadline?

18 A. You just did it. I think the 23rd of August.

19 Q. Did Benezet Consulting have independent
20 contractors in the Commonwealth of Virginia collecting
21 signatures for Rocky De La Fuente as an independent
22 candidate for president from mid-June through
23 Virginia's deadline?

24 A. Yes.

25 Q. Alabama, do you know their deadline?

1 A. I think it's --- it might be the --- if it's the
2 23rd of July --- of August then Virginia is like a week
3 later. So make Virginia 29th or 30th of August and
4 then make Alabama then 23rd. It's like the second or
5 third week of August.

6 Q. Did Benezet Consulting have independent
7 contractors in the State of Alabama collecting
8 signatures for Rocky De La Fuente as an independent
9 candidate for president from mid-June through Alabama's
10 deadline?

11 A. Yes.

12 Q. The last state that you provided me yesterday was
13 Mississippi, do you know when their deadline is?

14 A. The 9th of September.

15 Q. Did Benezet Consulting have independent
16 contractors in the State of Mississippi collecting
17 signatures for Rocky De La Fuente from mid-June through
18 Mississippi's deadline?

19 A. Yes.

20 Q. Not it appears to me there's significant overlap
21 amongst a lot of these states. They're going on at the
22 same time, is that accurate?

23 A. Yes.

24 Q. So people can't be in two places at the same time;
25 correct?

1 A. Yes.

2 Q. So am I correct that when you're talking about
3 deploying and having independent contractors, you have
4 some in, for example Virginia, others in Alabama, still
5 others in Mississippi. When a deadline may end, you'll
6 ship those people to yet another state; is that the way
7 it works?

8 A. Yes.

9 Q. The names that you provided me earlier today, that
10 was for Open Pittsburgh. Are those same people who did
11 all the collecting in all these various states for
12 Benezet?

13 A. Not always.

14 Q. How many people total did you have working on the
15 Rocky signature collection effort?

16 A. Probably total, over like 75. And then when you
17 talk about people under --- other subcontractors,
18 hundreds.

19 Q. Hundreds?

20 A. It's possible, I don't know.

21 Q. The states that we just talked about, did you
22 subcontract those states to anybody else?

23 A. Some of them.

24 Q. Which ones did Benezet subcontract to somebody
25 else?

1 A. I mean, technically, all the Northeast stuff is
2 Alex Arsenault.

3 Q. Okay.

4 A. So Massachusetts, Connecticut, New Hampshire,
5 Rhode Island, that's all him.

6 Q. Okay.

7 A. Wyoming, Montana, South Dakota, Washington is all
8 Brent Johnson. And then North Dakota, technically, is
9 Andy Jacobs. But I sent people --- I mean, I sent
10 people to these guys and I'm paying some of them. So,
11 it's kind of a weird arrangement, but some of these
12 guys --- yeah. But anyway, Kentucky is Paulie Frankel.
13 I don't know if I listed Kentucky.

14 Q. No, you didn't.

15 A. Kentucky is on that list too, September 9th. But
16 yes, we had people in between this date. Paulie
17 Frankel ---.

18 Q. So you said, just to make sure everything is
19 clear, Benezet Consulting had independent contractors
20 in the Commonwealth of Kentucky between mid-June, when
21 you got the Rocky contract and Kentucky's deadline for
22 collecting signature?

23 A. Yeah. I know that state because it was the most
24 recent --- we really didn't even start until the 30th
25 of August and it was due the 9th. Yes, we do. We

1 filed that. That was Paulie Frankel. Alabama I
2 oversaw. Ohio I oversaw. Pennsylvania I oversaw.
3 It's pretty --- Virginia, me and Derek Lee both
4 oversaw. Wisconsin was John Zom and I think that's
5 pretty much it.

6 Q. Okay.

7 A. The people in California, that was Brent Johnson
8 too, mainly.

9 Q. But if I understood your testimony, Benezet sent
10 its independent contractors to collect those.

11 A. Benezet sent their own independent contractors to
12 collect those, yeah. I mean these guys are independent
13 contractors too.

14 Q. Okay.

15 A. Were contracted, but they are.

16 OFF RECORD DISCUSSION

17 BY ATTORNEY JOEL:

18 Q. Of all the 75 --- when you say that you had 75
19 people, those are ones who were independent contractors
20 directly through Benezet?

21 A. Yeah.

22 Q. And then you mentioned hundreds total, is that
23 including the ---?

24 A. The Brent Johnson's, Alex Arsenault, those guys.
25 When you add up all their signatures, their circulator

1 pools, it will be over a hundred.

2 Q. So there were 75 that were independently
3 contracted with Benezet. Benezet subcontracted out
4 some of its work to others, for example the New England
5 work to Alex Arsenault, California work to somebody
6 else. And then it's your understanding that those
7 people, in addition to the Benezet assets you put in
8 place, also had their own independent contractors
9 collecting signatures?

10 A. Yes.

11 Q. Got it. And the nature of this business is that
12 the collectors go from state to state. They'll be
13 cranking out in one state, getting signatures, they
14 move around the locations within that state trying to
15 get signatures?

16 A. Yeah. I mean they're independent contractors, so
17 they'll do pretty much --- their mission is to get the
18 signatures and follow the laws to get them. But
19 they'll do whatever it takes and go to events. They'll
20 look up stuff in the newspaper, whatever they have to
21 do.

22 Q. So as an independent contractor, Benezet isn't
23 telling them, you have to be in this location to
24 collect signatures or that location to collect
25 signatures. Benezet leaves that to the independent

1 contractor. What Benezet is interested in is getting
2 as many ballot signatures as possible?

3 A. Yes. That's exactly what.

4 Q. And you leave the method to getting those ballot
5 signatures to the independent contractor?

6 A. Yes. With that said, I do provide them a, what I
7 call them a calendar, and I have my assistant Carlie
8 Rose see --- her job was just to calendar the state.
9 She would send them events and they could go to them if
10 they want. They all have each other's numbers,
11 usually. And they'll say I'm going to go to this or
12 I'm going to go to that. Everyone kind of just divvies
13 it up. But I don't do any --- telling anyone what to
14 do.

15 Q. You don't micromanage how they're getting them or
16 where they're going to get the signatures or the hours
17 they worked to get the signatures, or anything like
18 that?

19 A. Not at all.

20 Q. What Benezet does is it says, here's the state,
21 here are the deadlines, here are some events, have at
22 it, go get your signatures?

23 A. That's what we do.

24 Q. As you were discussing those states, you mentioned
25 a number of them --- you didn't necessarily start in

1 June, you started later. Can you tell me in each state
2 how many weeks you had Benezet folks deployed?

3 A. Yeah. I mean in most of them I can. Now in the
4 states I subcontracted, I don't know. But the ones I
5 did, yeah. I could have more than 10 days, probably,
6 in any state other than Pennsylvania. Is that an easy
7 answer?

8 Q. Yep. That's fine. And after that 10 days, you
9 moved on? Your independent contractors moved on to
10 someplace else?

11 A. Yep.

12 Q. And you may have had independent contractors in
13 different states at the same times, recognizing that
14 people can't be in two places. But, if I'm a collector
15 and Mr. Alexander is a collector, we could each be in a
16 separate state. If my deadline ends, you could then
17 say, alright, go over Mr. Alexander's state and try to
18 pick up some signatures?

19 A. Yes.

20 Q. Is that how it worked this past year?

21 A. It --- off and on. Some people would flake out
22 and just stop petitioning after one state and others
23 would go home, or call me on the next state and say can
24 we put them back in. But yeah, I would tell them where
25 the next state was going to be and where we needed

1 people and it was their job to figures out if they
2 wanted to go or not, and let us know.

3 Q. When Benezet was collecting for Rocky De La Fuente
4 as a Democrat in Pennsylvania, how many weeks were you
5 guys on the ground here collecting those signatures, or
6 days?

7 A. I got the contract a few days after the lawsuit.
8 The lawsuit was the first day of the signature
9 collection window. It's a three-week window. So I
10 probably had a little bit over two weeks.

11 Q. And when you were doing the Cruz work in the
12 Commonwealth of Pennsylvania, how much time was Benezet
13 on the ground here in the Commonwealth doing that?

14 A. Probably had two weeks. Just under two weeks.

15 Q. Has Jake Witmer ever had any ownership interest in
16 Benezet?

17 A. No.

18 ATTORNEY JOEL:

19 I've got my call in about 10 minutes, so
20 this would be a good time to break. I'm just about
21 done with him. I know you probably have some questions
22 though, and I may have some follow-up. But I'm just
23 about done with him. Let's take a break.

24 SHORT BREAK TAKEN

25 BY ATTORNEY JOEL:

1 Q. I took a couple of minutes to look through the
2 flash drive that you provided; you would agree that
3 there is a lot of documents on it?

4 A. Oh yeah. I tried to give you all everything.

5 Q. We do appreciate that. Unfortunately, we are not
6 in a position to look through everything to ask you
7 about it today.

8 A. That's fine.

9 Q. A couple things I asked about that I pulled and
10 I've got some more general questions and then we'll
11 have to figure out how ---

12 A. We can do a phone call or ---.

13 Q. --- we move forward if there's certain issues with
14 documents. Is that agreeable?

15 A. Perfect. Yep.

16 ATTORNEY ROSSI:

17 First of all, if there's any issue with
18 actually viewing the document, let me know the document
19 and I can get the hard copy from you, if necessary.

20 A. I can put them in pdf, so that should be doable.

21 ATTORNEY ROSSI:

22 So we can get those to you in a timely
23 fashion. I don't think you have the capacity to print
24 out 1,500 emails.

25 A. No. I might need to start traveling with a

1 scanner/copier.

2 ATTORNEY ROSSI:

3 Also I think were amenable to a follow-up
4 telephonic deposition with respect to specifically with
5 his production.

6 ATTORNEY JOEL:

7 Okay.

8 ATTORNEY ROSSI:

9 And we'll be --- whatever the time frame
10 is, well ---. In October, were obviously not going to
11 make it October. And our staff discovery ends October
12 31st.

13 A. Okay.

14 ATTORNEY ROSSI:

15 I'm also amenable to extending that if
16 necessary, if Judge Kane lets us.

17 ATTORNEY JOEL:

18 Okay.

19 ATTORNEY ROSSI:

20 Any reasonable amount of time. October
21 --- your schedule is like what in October?

22 A. I think --- we were going to try to take a trip,
23 but I mean --- you guys just let me know. I'm supposed
24 to go to Vegas the 30th, so I kind of have to be there
25 for that.

1 ATTORNEY ROSSI:

2 You have to be there for Vegas?

3 A. I don't know if I'm going to go or not, I'm
4 supposed to be in the wedding, so we'll worry about
5 that later.

6 BY ATTORNEY JOEL:

7 Q. Let me ask just a few general questions about what
8 you provided today.

9 A. Sure.

10 Q. Now you provided us with a flash drive; correct?

11 A. Yeah.

12 Q. And that contained however many documents it
13 contains?

14 A. Yeah. 1,500 plus whatever the attachments are.
15 1,500 emails plus attachments. Probably over a couple
16 thousand.

17 Q. Are all of those documents Benezet documents,
18 meaning they were in the care, custody and control of
19 Benezet?

20 A. They should be, yeah. I mean it's all from this
21 summer, so.

22 Q. And it's all from Benzet's efforts as at signature
23 collection for the 2016 election?

24 A. Yeah.

25 Q. And the 2016 presidential election?

1 A. Yes.

2 Q. And documents that are in there, for example,
3 emails by you were created by you; correct?

4 A. Or someone sent to me.

5 Q. That's my next question. But when you sent an
6 email, you actually typed it out and created the email?

7 A. Yeah. I should have.

8 Q. And when you received an email, it shows it going
9 to you?

10 A. It should have been; yeah.

11 Q. And you would have received those?

12 A. Yeah.

13 Q. I saw some other documents in there, for example,
14 some lists that show how many signatures various folks
15 collected. Those would have been compiled either by
16 Benezet or by you, or by somebody at Benezet's
17 direction or your direction?

18 A. Yeah. Probably a coordinator or yeah ---.

19 Q. And those lists, things like that, are part of
20 Benezet's business documents?

21 A. Yeah. Those are proprietary so ---.

22 Q. And they are created by Benezet or by your
23 designee and kept by Benezet in the ordinary course of
24 Benezet's business?

25 A. Yeah.

1 Q. To your knowledge, are all the documents in there
2 accurate and true?

3 A. Yeah. I haven't really looked at every single one
4 but I'm sure they are.

5 Q. And to your knowledge, are they all authentic?
6 Meaning they haven't been tampered with or anything
7 like that?

8 A. No.

9 Q. And they are whatever the purport to be, whether
10 it's an email, whether it's a list, whether it's a W-9,
11 we can look at it and whatever that shows, that's what
12 it is.

13 A. That's what it is, yeah.

14 Q. We may have some follow-up questions as we go
15 through it and I appreciate your willingness to
16 participate by telephone on that. Thank you.

17 A. Yep.

18 Q. A couple things that we did print out.

19 ATTORNEY JOEL:

20 Can you mark that one next, please?

21 (Deposition Exhibit 18 marked for
22 identification.)

23 BY ATTORNEY JOEL:

24 Q. I'm showing you what's been marked as Defendant's
25 18. It was an Excel spreadsheet so that's kind of the

1 way it printed. So I think it would be side to side to
2 side, but I think that is a list of people living in
3 the Commonwealth who you used or could use or were
4 planning to use, you tell me ---

5 A. Yeah.

6 Q. --- to be witnesses or circulators; is that
7 accurate?

8 A. Yeah. These are just people that we were
9 compiling a list of. You know, trying to keep some
10 sort of method to the madness that people are saying it
11 would be one or the other.

12 Q. So it would circulate the whole way then?

13 A. Witness --- yeah, that have some interest.

14 Q. Do you know how you go these names? Is this in
15 response ---?

16 A. Yeah. These are all the Craigslist and through
17 the grapevine, friends of friends, people's neighbors,
18 stuff like that. This is from Rocky, from the summer.

19 Q. Thank you. SO that was in connection with the
20 effort to collect signatures in Pennsylvania for Rocky
21 De La Fuente?

22 A. Yes.

23 Q. I've got a sting of emails here, and I'm going to
24 show them to you. You can look at all of them if you
25 want. I've just got a couple of questions about, so

1 you can take a look. And that's Defendant's Exhibit
2 19. That looks to me to be email chains back and forth
3 between you and that Amy Strauss who was a witness?

4 (Deposition Exhibit 19 marked for
5 identification.)

6 A. Yeah, this is ---.

7 BY ATTORNEY JOEL:

8 Q. And she was a witness that you brought in for the
9 --- was that for Rocky as a Democrat?

10 A. No, this was on the Cruz campaign.

11 Q. Oh, okay.

12 A. She was supposed to do the District.

13 Q. That's right. So Amy Strauss was a Pennsylvania
14 resident that you were using as a witness and a signer
15 of the affidavit for the Cruz, Republican signature
16 drive?

17 A. Yes.

18 Q. You can keep looking at it if you want, but I have
19 a couple of questions.

20 A. Sure.

21 Q. And it's a string so there's a lot of copy to pay,
22 things with bills on it, but I think this will --- this
23 is what I'm interested in. On February 12, 2016, Ms.
24 Strauss sends to you, that's your name; correct,
25 Trenton Pool?

1 A. Uh-huh (yes).

2 Q. Yes or no?

3 A. Yes, it is.

4 Q. And is that your email address next to it?

5 A. It is.

6 Q. And Ms. Strauss is --- comment is, hi, just

7 waiting to pay --- for pay from two days and 14

8 petitions that I got notarized, thanks. Do you see
9 that?

10 A. Yeah.

11 Q. So is that your understanding that she helped out
12 for two days and they got 14 petitions signed for Cruz
13 for president?

14 A. Yeah. And that's minor --- it's not very good at
15 all, and that's why we stopped.

16 Q. Do you know how many names were on those 14
17 petitions?

18 A. What she meant is 14 signatures.

19 Q. Well how do you know what she meant?

20 A. Because I remember that's exactly how many we had.
21 We had like 14 to 18 in that district. They spent
22 probably 20 hours hitting over 100 homes. She started
23 talking to herself at everyone's door.

24 Q. Okay. And who did you have --- was it Michael
25 Alexander that you had working that and Brian Lyra?

1 A. Brian Lyra and Michael were kind of like a team.
2 One would drive the other one would go with him. That
3 was my understanding. They always teamed up. They
4 were like best friends.

5 Q. And Michael and Brian had --- they were
6 independent contractors for you for a while?

7 A. Not for a while. I actually started using them
8 just this year. That's really --- I mean this year is
9 really the year of my business being a business. But
10 they have, yeah. They've been pretty ---.

11 Q. They are good signature collectors?

12 A. They are. They are very good.

13 ATTORNEY JOEL:

14 I think that's all I have at this point.
15 I'm sure your attorney has some questions, which may
16 prompt some more questions ---.

17 A. I'm sure it will.

18 ATTORNEY JOEL:

19 I'm good right now. Thank you.

20 OFF RECORD DISCUSSION

21 EXAMINATION

22 BY ATTORNEY ROSSI:

23 Q. Let's start with --- we talked a lot about, and
24 this really created a fair and comprehensive records to
25 where your petitioners were, who they were and a pretty

1 good timeline with respect to where all your
2 petitioners work and how they work. Let's get into the
3 issue of, how do you go about collecting a signature?
4 What is --- from a professional circulator standpoint,
5 how do you go about in the most effective manner to get
6 a signature?

7 A. Well first it starts with preparation. So you
8 need to make sure you have the materials.

9 Q. What materials do you need?

10 A. So I would have a --- I kind of do this all the
11 time. I'll go get a bunch of boards cutout from FedEx,
12 I don't use clipboards. I tell my guys not to use them
13 either, they're heavier. We go get foam boards and we
14 basically cut them out just a little bit slightly
15 bigger than the piece of paper were circulating. It's
16 a nominating paper, a nominating petition, whatever the
17 size of that is. And we use binder clips because you
18 can carry about ten of these boards and it weighs about
19 the same as two clip boards. I try to give everyone a
20 couple boards; you know, I'll give them like four so
21 they can get four people signing at once.

22 Q. So you don't actually use clipboards?

23 A. No. I use foam boards. We make them in house.
24 It's basically a foam board, you know, one of those
25 sheets --- a sheet of foam. It's cut down into to

1 about six or seven boards and that way the circulators
2 are not carrying around a bunch of heavy stuff all day.
3 They get less tired but also they can get more people
4 signing at once, it's a lot lighter. We'll use that
5 instead.

6 Q. What do you mean getting more than one person
7 signing at once?

8 A. So when you're doing a big event or a busy street
9 corner, imagine downtown Philadelphia, you'll have a
10 bunch of people coming by.

11 Q. Yeah.

12 A. So you know, you're not just getting one person to
13 sign, you want --- I mean I've had 12, 15 people
14 signing at once. Now I wouldn't do that with a
15 witness. In the anchor, I would do it with myself
16 but ---.

17 Q. You mentioned anchor, what's an anchor?

18 A. A witness is an anchor. Any person that's
19 basically has to --- you're basically anchored to them,
20 so they're --- a witness, we call it an anchor, but
21 it's really ---. If you're petitioning on a street
22 corner with 15 boards out, the chances are --- I can do
23 it, Jake Witmer could do it, Michael Alexander could do
24 it, but a witness who just started the process wouldn't
25 probably be able to keep up. I don't think that they

1 would be able to sign off on the Decs.

2 Q. And a dec means what?

3 A. The declaration.

4 Q. Okay, dec is short for ---.

5 A. I would be concerned that they wouldn't be able to
6 follow everything that is going on. So I wouldn't do
7 more than probably five boards with a rookie.

8 Q. So outside Pennsylvania, in a state that doesn't
9 have a witness restriction, is it your testimony that a
10 professional circulator can have more than ten boards
11 running at once?

12 A. Yeah. I think Jake usually carries around 12.

13 Q. That's ---.

14 A. I've seen him have every one of those boards out.

15 Q. So how does he --- how do you engage 12 people at
16 once? I mean what's the mechanism for getting a crowd
17 of people signing?

18 A. Imagine going to a Penn State game and there's 20
19 people sitting around and you say, hey, would you mind
20 signing our petition to help a presidential candidate
21 on the ballot, if you're doing Rocky for instance
22 because anyone can sign up. And they say --- well you
23 ask them first if they are registered Pennsylvania
24 voters. If they say yes, you mind helping out? Tell
25 them who is he, what he's about. If they say yes, get

1 the pen and the board.

2 Just kind of work the --- get them all to sign,
3 give them all the pen and the board. Make sure they
4 know a little bit, answer their questions. Guide them.
5 Explain them all. Sign, print, address or street
6 number/address or house I think. And then --- the
7 petition is weird, I think it's street number, then
8 street, then I think it's city actually. And the
9 date's afterwards. Usually the date's at the front.
10 But you would basically just guide them through that
11 and tell each one how to do it and gather it up.

12 If you are working an event, it's the same thing.
13 Some petitioners, I've seen, will make a Post-it note
14 and actually put it on the petition if they're only
15 doing one and not flipping. They'll sometimes put a
16 Post-it note, instructing sign here, print here so
17 everyone can kind of follow it. They'll see it with
18 like a Post-it note.

19 But yeah, basically it's kind of --- and when you
20 get a big event like that going on, you'll have a chain
21 reaction going. When people are coming by, you have go
22 to into the crowd, work them. Sometimes they'll run
23 away and you have to be persistently kind of after
24 them. It is a kind of --- being as persistent as being
25 able to bounce back kind of quickly. You have to be

1 able to take a --- go with the flow, take a hit and
2 bounce back.

3 Q. You talk about dynamic --- so this is a dynamic
4 ---. Going after people ---. If I'm a professional
5 circulator, do I stand on the corner and wait for the
6 persons to come to me and just remain static or do I
7 move --- am I working through a crowd like a salmon
8 through a river?

9 A. Both.

10 Q. Am I moving through the crowd?

11 A. Both, yes. You can. It depends on your location.
12 Some locations --- after your materials, location is
13 the second most important thing. I mean you want to
14 have a good --- you want to have high pedestrian filled
15 traffic. Imagine Harrisburg, y'all have like events
16 and stuff out in the park, stuff like that. You want
17 to make sure what works better. Maybe on like a
18 Saturday during game day on Front Street. Think about
19 where the most people are going be on any given day or
20 an event.

21 So you want to find these --- but then an event,
22 like a good example is the Pittsburgh Pickle Bird
23 festival. There's 10,000 people on the 9th Street
24 Bridge. You want to be going through the crowd,
25 getting as many signatures as possible, working as many

1 boards as possible. And we were able to do that this
2 summer with the Rocky campaign because we didn't have
3 anchors behind us preventing us from not being able to
4 work that area.

5 Now, when you are working like the presidential
6 primary stuff, it's completely different. You're not
7 going to be going in the crowds. You're not going to
8 be engaging voters. You're going to be sitting where
9 the anchor is that you don't leave there, the general
10 area so that you can watch and monitor to make sure
11 that you are doing ---.

12 Q. So again, when you talk about anchor, you're
13 talking about a witness?

14 A. The witness is the anchor.

15 Q. The witness is the anchor. So when you don't have
16 an anchor, you can actively move through a crowd,
17 negotiate a crowd and ---?

18 A. Your volume will increase.

19 Q. Your volume will increase?

20 A. Tremendously.

21 Q. Is it your testimony because you are able to
22 engage more people in that manner?

23 A. Yes.

24 Q. The movement of the circulator through the crowd,
25 they can hit more people rather than staying in a

1 static location?

2 A. Yeah. And I mean, it really depends on the crowd
3 too. If there's a crowd that is static, then I'm going
4 to need and navigate through it and start asking
5 people. If the crowd is moving and ambulatory, then
6 I'm going to be walking back and forth in probably a
7 30-foot radius diameter. But I'm not going to be
8 sitting at the street corner, ever. I'm always ---
9 were constantly moving. You're never --- you know, if
10 you're at a street corner, like in downtown Philly and
11 it's been pretty high steady foot traffic and there's
12 no events going on. That's one thing that might pan
13 out.

14 But it's not --- the ideal situation is to be as
15 flexible and mobile as possible and be able to ---.
16 When I'm petitioning, I'll easily run back and forth
17 across streets. I can, you know --- I'll chase people
18 down the street if they seem interested. A lot of
19 people don't want to stop to sign but if you'll walk
20 with them, they'll sign. I've done that a lot of
21 times. I'll say hey man, I'm at your mercy, wherever
22 you're taking me, we'll go. Just if you mind helping
23 us out, we're trying to put another candidate on the
24 ballot, that kind of thing.

25 Q. And if you have an anchor, the anchor has to

1 follow you?

2 A. The anchor will follow you, yeah.

3 Q. If the anchor is not willing to follow you, you
4 can't engage the voter in that?

5 A. You wouldn't get those signatures.

6 Q. If you have an anchor --- the instate witness ---
7 again I like the term anchor because it's a --- I
8 didn't know you could --- I never envisioned them an
9 anchor but ---.

10 A. They're definitely an anchor.

11 Q. I just want to be clear, whenever I say an anchor,
12 I'm referring to the instate witness, just to be clear
13 for the record. But the instate witness --- strike
14 that.

15 When you're operating with an instate witness, are
16 you able to work as many boards as you would like?

17 A. No.

18 Q. And state for the record, why is that?

19 A. Like I said, I would be cautious to work more
20 boards than the person is comfortable with. And I'm
21 not trying to sound arrogant, I consider myself to be
22 intelligent and smart. I'm very ADD. I have a lot of
23 things going on at once, I can multitask. I could have
24 probably 15 people signing, I feel like, if I was able
25 to control the discourse and make sure that I'm able to

1 handle it. I probably wouldn't do that often, but I've
2 done it multiple times. Jake can do it.

3 A witness coming on, the first couple days if
4 they're green, they're not going to --- I wouldn't be
5 more comfortable than having four boards. Just so you
6 get the process down. And then as they move on and on
7 and get better. It requires --- petitioning --- a lot
8 of people think that it's, you know, anyone can do it.
9 There is no barrier entry, but it does require people
10 skills, emotional intelligence, being able to read
11 people. You're not going to go up to some guy that's
12 drunk and carrying a gun and looks like he's about to
13 go off on someone. You've got to be able to have very
14 high awareness of people and read situations pretty
15 well. Especially when you are working in cities that
16 you've never been to before. Because of that we try to
17 --- I try not to overwhelm a witness coming in, just
18 because I'm concerned.

19 And I know that it is a concern, because I've had
20 witnesses not feel comfortable signing off on stuff in
21 the past. I think that they --- we had one situation
22 where, I can't remember what happened, but it was
23 basically, they didn't --- I think it might have been
24 with Jake or someone, I can't remember. But basically
25 they didn't want to do the --- I think having --- if

1 you're doing too many things at once, it can overwhelm
2 someone who is new.

3 Q. Your instruction to a witness --- what is your
4 instruction to a witness? What is it that they have to
5 witness?

6 A. They need to witness the signature being gathered.

7 Q. So your instruction to the witness is that they
8 have to keep an eye on every signature which is being
9 recorded on a petition?

10 A. That's my understanding, yeah.

11 Q. And is it your testimony that if you have too many
12 boards running, they don't feel like they can keep
13 their eye on the signatures?

14 A. I would be cautious to say that they could, yeah.

15 Q. And you, as the one who is ultimately responsible
16 for everything that is turned in for Benezet, are
17 mindful of that legal requirement?

18 A. Yeah. I mean they're the ones signing the dec,
19 and they read the dec and when we do the training with
20 the petition --- with the witnesses, I go through every
21 part of the petition with them. So we break it down,
22 part A, part B, part C, part D, part E. I have the
23 witnesses read the parts that they are going to be
24 declaring and also the beginning, end and all that.

25 Then they'll ask questions, there's substitution,

1 electors, everything is on the petition. They'll
2 actually go through and ask questions about it and we
3 cover it, like I'm giving them a mini ten-minute
4 education on what the components of the petition are.
5 Then I explain to them the dec and we go through it
6 line by line in plain English and define each and every
7 part of it so they know what it is. So I make sure
8 that they're comfortable, because we need to retain
9 these guys.

10 I need the attrition rate to be high, I can't have
11 them not show up the next day, which happens every day.
12 Not having a witness show up and then one of my
13 petitioners is just burning money sitting in a hotel
14 room. So we try to make it as easy for them and
15 bearable for them so that they're comfortable with it,
16 so there's no issue that arises so that we can get the
17 job done.

18 Q. So in addition to your concern about the legal
19 requirement that they keep an eye on every signature
20 that's being gathered, you also limit the number of
21 boards which are being circulated by your professionals
22 so that your witnesses are not overwhelmed so that they
23 come the next day; is that your testimony?

24 A. Yeah. I don't --- I really --- and I believe that
25 we didn't have an issue with this because no one really

1 carried more than four boards in Pittsburgh. I think
2 that everyone kind of knew that, you know, the
3 witnesses were just going to sit around. Like Jake,
4 he's normally up there with eight or ten boards. But
5 he had --- he was working with four, I think. And I
6 --- definitely, everything is slowed down. Production,
7 completely but also the professionals out there,
8 they're going to pull back what their average --- what
9 their daily production without a witness or anchor
10 would be is drastically decreased. Does that make
11 sense?

12 Q. Yeah, it does. Now --- you testified that you
13 circulated nominating petitions in Pennsylvania in the
14 winter --- during January, February of 2016?

15 A. Uh-huh (yes).

16 Q. And then you also circulated nominating papers,
17 strike that.

18 Nominating papers in Pennsylvania during the
19 summer of 2016 for Rocky De La Fuente?

20 A. And the Libertarians and the Greens.

21 Q. And Libertarians and Green Party?

22 A. Uh-huh (yes).

23 Q. And you also circulated for OpenPittsburgh.Org?

24 A. Yep.

25 Q. So during this string --- let's take the mechanics

1 of circulating for Mr. Cruz for president. So in 2016,
2 the only time that you used in state witnesses was
3 during the circulation of petitions, nominating
4 petitions for Republican and Democrat?

5 A. Yes. For the nominating petition.

6 Q. So on average for the out of state --- for the
7 professional circulators that came into Pennsylvania,
8 did they --- strike that.

9 Were there any circulators, any of your
10 professional circulators for both the petitions, the
11 papers and the referendum petitions, all three?

12 A. In other words, I think Michael was there. I
13 think Ben Mason was there. I think --- Andy didn't do
14 it all. There's got to be more than them.

15 Q. What about Gerald Bundy?

16 ATTORNEY JOEL:

17 Joe Bundy?

18 BY ATTORNEY ROSSI:

19 Q. Gerald Bundy?

20 A. Yeah.

21 Q. Their production ---.

22 A. Pretty much everyone from Pennsylvania was ---.

23 Q Let's talk about their production levels. During
24 the presidential primary nominating petitions, did ---
25 the number of signatures that Michael received, that

1 Michael obtained during the presidential primary were
2 the same that he got during the nominating paper on a
3 daily basis?

4 A. I would say no. I mean ---. So somedays he
5 couldn't even work.

6 Q. Did their production go up or down from petitions
7 to papers?

8 A. Completely down, I mean he was able to work. We
9 didn't have witnesses every ---. The witnesses that he
10 had sometimes wouldn't even show up. If you gave him
11 --- was able to do a thousand signatures over a couple
12 weeks in Pennsylvania.

13 Q. For who?

14 A. For Rocky.

15 Q. For Rocky, but not for Cruz?

16 A. No. He didn't do Cruz, he did Rocky

17 Q. He did Rocky, Democrat?

18 A. Yes.

19 Q. So Michael Alexander worked Rocky, Democrat and
20 Rocky, independent?

21 A. Rocky, Democrat, Rocky, independent.

22 Q. And did he work on the Pittsburgh.org case?

23 A. I can't remember. I'd have to look. I think he's
24 on that list.

25 Q. Do you have that list?

1 A. I'd have to look, I'm not a hundred percent
2 certain. I think he is. Yes, he is on there.

3 Q. So take Michael Alexander. He circulated for
4 Rocky, Democrat?

5 A. Michael Jennings.

6 Q. I'm sorry?

7 ATTORNEY JOEL:

8 He's talking about Michael Alexander.

9 A. We're talking about Michael Jennings.

10 BY ATTORNEY ROSSI:

11 Q. I'm talking about Michael Alexander.

12 A. Oh okay.

13 Q. Did he circulate for Rocky, Democrat?

14 A. Yes, he did.

15 Q. Did Michael Alexander circulate for Rocky,
16 independent?

17 A. No.

18 Q. Did Michael Alexander work on OpenPittsburgh.Org?

19 A. No, he did not.

20 Q. So let's talk about Michael Jennings. He
21 circulated for Rocky, Democrat?

22 A. Yes.

23 Q. He circulated for Rocky, independent?

24 A. Yes.

25 Q. And he circulated for OpenPittsburgh.Org?

1 A. Yes, he did.

2 Q. Let's take Michael Jennings as a --- to see how he
3 did.

4 A. Okay.

5 Q. And I understand that these are going to be
6 estimates and to the extent that we can get detailed
7 numbers submitted and we --- let's do that. But right
8 now --- I understand that you were getting ---. So
9 Michael Jennings, Rocky, Democrat, what did he do on
10 average per day?

11 A. I'd have to go look, but it was probably --- the
12 days that he was able to work, he was probably getting
13 close to 75 to 100 a day.

14 Q. And would it be your expectation that he would not
15 --- at all times he worked with a witness?

16 A. A hundred percent.

17 Q. For Rocky, Democrat. Is it your understanding
18 that he would limit the number of boards that he was
19 running?

20 A. Mike is a not a really good example because he is
21 not --- and I'm not saying this in any way, he's just
22 not very smart. He's got --- didn't come from that
23 good of a family or home or whatever. He doesn't like
24 to stack, he's not like a normal petitioner. I
25 wouldn't use him as a good example. He doesn't stack,

1 he doesn't do a lot of things.

2 Q. Who of your circulators that worked in
3 Pennsylvania for all three drives?

4 A. I think he's actually the only one to be honest,
5 unfortunately. So he's not a good example though. If
6 you compare like Jake Witmer across the board, he would
7 do --- Jake would probably do 250 a day with a
8 witness ---.

9 ATTORNEY JOEL:

10 Let me just object. I think this is
11 hypothetical.

12 A. It is hypothetical.

13 ATTORNEY JOEL:

14 Okay, fine. I just wanted to clarify
15 that.

16 ATTORNEY JOEL:

17 Okay.

18 BY ATTORNEY ROSSI:

19 Q. Well they just need experience. Jake Witmer with
20 the witness.

21 A. He was crushing them downtown at the downtown
22 Pittsburgh library. He was getting 250 a day.

23 Q. With a witness?

24 A. Without a witness, he probably would have gotten
25 400.

1 Q. Are there situations where he has circulated
2 petitions without a witness where he actually got 400 a
3 day.

4 A. I've seen him get 500, 600.

5 Q. Without a witness?

6 A. In the Chicago subways, of course. He's one of
7 the best petitioners when he wants to be. He's not
8 always on fire. He needs management.

9 Q. Now, based on your testimony, you brought in about
10 25 to 30 people?

11 A. Twenty-five (25), yeah.

12 Q. Twenty-five (25) to 30 for OpenPittsburgh.Org?

13 A. Uh-huh (yes).

14 Q. Why didn't you have those kind of numbers for the
15 Pennsylvania presidential circulation?

16 A. We brought in about half as many people for
17 Pittsburgh for the presidential petition, so that was
18 number one. But number two, these people don't have
19 anchors. These people are having to circulate as soon
20 as they hit the ground. They are able to start
21 collecting immediately. They don't have to wait and
22 they're not limited by when person X, who's a
23 registered Democrat or Republican voter says they are
24 looking to work with him.

25 Q. Are you saying that --- is it your testimony that

1 you were limited in the number of people, professional
2 circulators you could bring in from out of state
3 because you didn't have enough witnesses?

4 A. A hundred percent.

5 Q. Had it not been for the witness requirement, you
6 could have brought in more professional circulators
7 into Pennsylvania?

8 A. Yes.

9 Q. And you didn't because you didn't have witnesses?

10 A. A hundred percent.

11 Q. Now you say you did advertising on Craigslist?

12 A. Yeah.

13 Q. How many witnesses did you actually use from your
14 advertisements from Craigslist in Pennsylvania in 2016?

15 A. We got about probably ten responses.

16 Q. Total?

17 A. Yeah.

18 Q. And of those ten ---?

19 A. We had a job in Pittsburgh, so we just did
20 Pittsburgh on Rocky.

21 Q. I think it was your testimony that 2016
22 presidential primary, you circulated for Rocky,
23 Democrat and Ted Cruz, Republican; correct?

24 A. Uh-huh (yes).

25 Q. Refresh my recollection as to, are there other

1 candidates that you worked for in Pennsylvania in 2016
2 for the presidential primary election?

3 A. No.

4 Q. So were just talking about Rocky, Democrat and
5 Cruz, Republican?

6 A. Uh-huh (yes).

7 Q. How many witnesses were you able to recruit in
8 Pennsylvania for Rocky, Democrat?

9 A. Probably about --- me personally spending two
10 weeks doing it, I probably got five good people. Now
11 people like Mike were able to procure some of their
12 own. Some of them started trying to network and do
13 their own thing. All my petitioners are told when they
14 are out with another petitioner coming by who is
15 interested in a job is a perspective lead. The goal is
16 to have --- each petitioner needs five to six
17 witnesses. Because none of these guys do show up on
18 time, they are all flaky, they're not dependable and
19 they won't ---.

20 Q. For Republican Cruz in 2016, how many Republican
21 witnesses were you able to recruit in Pennsylvania?

22 A. I think I got two. And the campaign helped us get
23 the other ones. And then we had a couple people who
24 were already registered, like Rick Chera, who is a
25 delegate. Well I guess you can't bring him up --- like

1 a Ron who I got through the grapevine, a couple other
2 guys like Andy.

3 Q. If I remember your testimony is that --- and prior
4 testimony frankly, some of the Cruz delegates actually
5 went along with the circulators, so they serve his or
6 her own witnesses.

7 A. I think it was mainly Andy and Rick and then there
8 was one guy, Ron, who wanted to be a Cruz delegate and
9 didn't because we just didn't have time.

10 Q. In totally, your testimony is that we you able to
11 get --- you actually put into the field seven witnesses
12 for both Rocky, Democrat and Cruz. Just you, Benezet
13 Consulting recruiting efforts, when you came into
14 Pennsylvania in February?

15 A. Yeah. I got more than that total.

16 Q. Five for Rocky and two for Cruz?

17 A. Yeah.

18 Q. That's all you were able to find?

19 A. Well I got more than that in total, but that's how
20 many actually --- because a few more responded. I had
21 probably 12 people total respond to my stuff. We were
22 putting up ads every day, but the probably is that they
23 would flake out and not show up. I was spending too
24 much time trying to get them to show up again.

25 Q. For 2016 presidential in Pennsylvania, for both

1 Rocky, Democrat and Cruz, Republican what methods did
2 you use to recruit witnesses?

3 A. We used Craigslist.

4 Q. Any other methods?

5 A. I showed you the little flyer. I don't know if
6 you've given it to them yet, but I sent that to you. I
7 don't have any more copies of it. It's the one that
8 had the little edge cut out. I put those at all the
9 little stores that had bulletin boards. People would
10 call me form that.

11 Q. So you used stop lists to advertise?

12 A. Strip --- yeah. Bulletin boards, stuff like that.
13 And then we would --- word of mouth, but also people
14 that were already to become a witness, we would ask
15 them if they knew anyone that was interested, that kind
16 of thing.

17 Q. And networking?

18 A. Networking, yeah.

19 Q. So you used --- let me ask the question. So you
20 used Craigslist, people that you already knew in
21 Pennsylvania ---

22 A. Uh-huh (yes).

23 Q. --- people that your circulators knew?

24 A. Uh-huh (yes).

25 Q. Say yes.

1 A. Yes.

2 Q. Word of mouth?

3 A. Yep.

4 Q. And any other method? Though the campaign --- did
5 you call any campaigns?

6 A. I didn't talk to Rocky's campaign. Sean taught me
7 how to do the Craigslist and the --- he set me up with
8 an Indeed account too. So he was able to find a few
9 people that way.

10 Q. What is an Indeed account?

11 A. Indeed.com. It's basically like a --- looking for
12 people to hire.

13 Q. So it's another form of Craigslist?

14 A. Yeah. Another Craigslist.

15 Q. So generally internet advertising you used?

16 A. Yeah.

17 Q. And in total, how many witnesses did that yield
18 for Rocky, Democrat and Ted Cruz, Republican in
19 Pennsylvania. In total how many witnesses were you
20 able to generate through those advertising mechanisms?

21 A. Probably about 15.

22 Q. Fifteen (15)?

23 A. Yeah.

24 Q. Now these 15 witnesses were then deployed into the
25 field with your professional circulators; yes?

1 A. That was the idea. But no one got out.

2 Q. What happened?

3 A. About one --- three-fourths of them crapped out or
4 don't show up or flake out, or say they'll show up and
5 don't, and waste a whole day of petitioning or waste
6 the day. So then I have to pair up that petitioner who
7 misses the appointment that were going to train the
8 witness with another anchor who is already working with
9 another petitioner.

10 Q. So let's bore this down. How many of these 15
11 people, how many actually showed up at some point? All
12 15?

13 A. Probably four.

14 Q. You say you recruited 15 people, witnesses through
15 this advertising method; correct?

16 A. Leads. Fifteen (15) leads.

17 Q. Oh 15 leads. These are not --- so you got 15
18 total leads from all your advertising efforts in
19 Pennsylvania for 2016 presidential nominating petitions
20 for rocky and Cruz?

21 A. Uh-huh (yes).

22 Q. You had 15 leads?

23 A. Uh-huh (yes).

24 Q. And of those 15 leads, how many actually showed up
25 in physical form at some point in time?

1 A. Less than five for Rocky.

2 Q. What about for Cruz?

3 A. The Cruz campaign were the ones who provided us
4 with those witnesses.

5 Q. So you got most of your witnesses for the Rocky,
6 Democrat petition drive came from the internet and word
7 of mouth and networking advertising?

8 A. Yep.

9 Q. Yes?

10 A. All of them.

11 Q. Ted Cruz's campaign, however, provided their
12 witnesses to you?

13 A. Yeah.

14 Q. And some of those included the delegates
15 themselves that wanted to get on the ballot because
16 they wanted to go to the Republican national
17 convention?

18 A. That's right.

19 Q. Do you know the number of total witnesses you had
20 deployed for Cruz's campaign?

21 A. I didn't have any because they were all registered
22 Pennsylvania voters.

23 Q. Fair enough. So where a delegate served as his
24 own witness, you don't know how many you actually had
25 in the field?

1 A. Or like Andy --- Andy is a registered Republican.

2 Q. So he doesn't need a witness; correct?

3 A. I think --- I can't remember what happened, but I
4 think he did use --- I think him and Rick teamed up.
5 His brother also is registered Republican. Then you
6 have his --- Ed Mason, Denise Mason, they are
7 registered Republicans. Amy Strauss, that is one
8 person I did source who is a Republican off of
9 Craigslist for Cruz. She was out in Philly. Michael
10 Alexander and Brian Lyra were coming that way, we
11 paired them up immediately and had them do the district
12 that the Cruz campaign wanted out there until she
13 was ---.

14 Q. Is that the Bucks County district?

15 A. Yeah.

16 Q. You know the district number for it?

17 A. I think it's 18 or 8, or something like that. Do
18 you all know?

19 Q. It may be 18. But the congressional district for
20 Cruz in Bucks County is where you had Amy Strauss
21 deployed?

22 A. Yeah.

23 Q. Now of these witnesses, you had 15 leads, 5 showed
24 up for Rocky, did you have any problems with them once
25 they actually showed up, once they were trained and

1 once they were deployed into the field? Did you have
2 any issues with these witnesses?

3 A. Yeah. I mean a lot of them don't like the job so
4 they'll quit. A lot of them like the job and they
5 think it's easy work and it's great but they're not
6 dependable.

7 Q. What do you mean by not being dependable?

8 A. Well they don't treat it --- we'll tell them, like
9 they'll come in after the day is over and I'll say hey,
10 how did it go? Did it work out? And they'll say yeah,
11 I'm doing great. See you tomorrow right? Give them a
12 time, tell them when to show up and then they don't
13 show up.

14 Q. And when a witness doesn't show up, what does ---
15 and the witness is there to witness the job of the
16 professional circulator; yes?

17 A. Yes.

18 Q. And when a witness doesn't show up, what do you do
19 with the circulator who was going to be anchored to the
20 witness?

21 A. We have different things. One, they'll sit in the
22 hotel room. Two, if there's a busy enough traffic
23 area, maybe a Saturday in Pittsburgh you can go down to
24 the strip district and there's the whole market day
25 scene. We'll have many one or two people pair up with

1 one witness. So we'll have one anchor with two boats.
2 So basically what they'll do is stand on opposite
3 corners and make sure that the witness' attention is
4 gathered every time the signature is being signed. So
5 if you have a signer, you say John or whoever it is,
6 got a signer and look them in the eyes and make sure
7 everything is being ---.

8 Q. Now in that circumstance where you have to marry
9 an anchor witness to two boats, is that what you call a
10 circulator that are anchored to a witness?

11 A. Two boats, yeah. Well that's my analogy.

12 Q. So that makes the witness a boat anchor?

13 A. It is a boat anchor; yeah.

14 Q. You have these two circulators anchored to a
15 witness.

16 A. Yes.

17 Q. Are they able to operate in their normal fashion
18 ---. Your prior testimony was that that's the way to
19 get signatures is to navigate through a crowd and to be
20 mobile, be ambulatory; correct?

21 A. That's exactly right.

22 Q. So if a witness has to eyeball two circulators,
23 does that place a limit on the range of motion for the
24 circulator?

25 A. Yeah. I mean they're not leaving that street

1 corner. And that's --- it doesn't happen all the time
2 because it's not a comfortable situation for any of
3 them. But sometimes, if the guy is just sitting in a
4 hotel room and it's a busy enough street location, I'm
5 pretty sure like Bob Lynch and Michael might have done
6 it once or twice with one of the guys. They're not
7 leaving the damn street corner.

8 Q. And is it your testimony that that reduces
9 production?

10 A. 100 percent. If that situation arises, they're
11 not going to be productive.

12 Q. So you're losing signatures because of the
13 witness?

14 A. Definitely. They're lucky to be getting any
15 signatures that day, is the way I'm looking at it.

16 Q. Now, since we're talking about witnesses, you ---
17 this came up earlier, and I think Mr. Joel was
18 interested in --- maybe not. Andy Jacobs is a
19 Pennsylvania resident; correct?

20 A. Yes.

21 Q. He's a registered voter? He's a registered
22 Republican, actually?

23 A. Registered --- I think he is. I'd have to ask
24 him. I know he's a registered voter, though.

25 Q. And he's one of your better circulators; correct?

1 A. Yeah, he's really good. He's been circulating for
2 10 or 15 years.

3 Q. And he's in Pennsylvania, and you used him in ---
4 for Ted Cruz, 2016 president, in Pennsylvania?

5 A. He worked on --- I think he might have done some
6 Trump or something. I don't know what all he did, but
7 he worked for me for Cruz.

8 Q. But he didn't witness his own petitions; correct?

9 A. I don't believe he did.

10 Q. Why is that?

11 A. I think there was a worry that Edee was going to
12 challenge his out-of-state driver's license. That's
13 what he told me.

14 Q. I know who Edee is, but for the record, who is
15 Edee?

16 A. She is the one who was doing Trump's campaign.

17 Q. What's her full name?

18 A. Edee Baggett.

19 Q. So ---?

20 COURT REPORTER:

21 Baggett?

22 A. Baggett.

23 ATTORNEY ROSSI:

24 Baggett.

25 A. B-A-G-G-E-T-T, Baggett.

1 BY ATTORNEY ROSSI:

2 Q. And who is Edee --- for the record, who is Edee
3 Baggett?

4 A. She's a big petition coordinator. She's a really
5 nice lady. I didn't think that she would, and I don't
6 know why that's even an issue, because I think the
7 statute is just to be a registered voter, but, you
8 know, he paired up with someone so it didn't matter.

9 Q. Edee Baggett made a threat?

10 A. She didn't make a threat, but she said I would be
11 concerned about Andy Jacobs' driver's license,
12 something or ---.

13 Q. And why is that?

14 A. I have no clue.

15 Q. To your knowledge, is Andy a resident in
16 Pennsylvania?

17 A. He says he is, yeah.

18 Q. And what is the issue with his driver's license?

19 A. I don't know. You'd have to ask Andy. It's out
20 of state. That's the issue.

21 Q. So it's your testimony that Andy's driver's
22 license is out of state?

23 A. That's my understanding.

24 Q. He does not have a Pennsylvania driver's license?

25 A. No.

1 Q. So the concern is that Andy may not qualify as
2 being a Pennsylvania resident?

3 A. I'm assuming that's what he was concerned about.

4 Q. And because of that, Andy had some other person,
5 such as his brother, witness his signatures?

6 A. Yeah. That's what he told me, he basically had a
7 witness --- he was running a witness operation.

8 Now, I don't know --- the statute is that they
9 need to be a resident. I don't know what the
10 residential requirement is, either, so I can't really
11 speak to any of this stuff other than my people, like
12 Andy, you know, I don't even --- I wouldn't even begin
13 to tell Andy what to do, because really, I --- me and
14 him are like, I worked for him, he worked for me this
15 time, but ---.

16 Q. But Andy thought it was important, given Edee's
17 questioning about his status as a Pennsylvania
18 resident? He was proactive in having a witness so that
19 that issue was never ---?

20 A. Yeah, I guess so. The campaigns, when we start
21 getting into the primaries stuff, and this goes back to
22 the issue of me doing what Mr. Joel had told us in the
23 courtroom, and I just thought it was a great idea,
24 contacting the local Republican club. After Edee said,
25 hey Trent, would you want to do the District 14 stuff,

1 and I said yeah, I got a witness, I'd probably get a
2 few more just because I know how flaky they are, so I
3 started contacting people and trying to find Republican
4 witnesses to do the Trump stuff. You know, these
5 campaigns are so competitive that it can become a
6 Mexican standoff and a challenge situation. They'll
7 start trying to sabotage each and every other person's
8 collection efforts.

9 So, you know, politics is a blood sport and
10 unfortunately that is the nature of the beast. I
11 didn't realize when I asked the Republican club for
12 witnesses to help on the Trump campaign, to help gather
13 signatures for Trump, that that would get me fired from
14 a job. Just like I don't know why Andy did that, but
15 obviously he felt --- he's been around the block so
16 he's probably seen a million challenges before, I don't
17 know.

18 Q. Let's talk about ---.

19 A. Signature challenges are the most --- everyone's
20 worried about that, what's going to happen, especially
21 in Pennsylvania because it's kind of --- at that time,
22 it wasn't as established to what the challenge --- I
23 think there was a question of what a challenge would
24 look like. There's something in the case law book
25 pending, maybe.

1 Q. Let's go back to your attempt to work for Trump in
2 Pennsylvania.

3 A. Uh-huh (yes)?

4 Q. In 2016 in Pennsylvania, Edee Baggett offered you
5 a subcontracting job to do Trump in Pennsylvania?

6 A. Yeah.

7 Q. Okay. And ---?

8 A. As long as I did it personally. And I was.

9 Q. So did that mean you personally sign it, or do it?
10 Or Benezet Consulting professionals?

11 A. I couldn't go and outsource it to any of my
12 people, she said.

13 Q. So Edee Baggett was hiring you personally ---

14 A. Yeah.

15 Q. --- to circulate petitions for Trump in
16 Pennsylvania?

17 A. Sure.

18 Q. And not Andy Jacobs? You couldn't use Andy
19 Jacobs; you couldn't use Jake Witmer.

20 A. That's when she told me not to use Andy Jacobs.

21 Q. Just you?

22 A. So we're not actually really talking about Benezet
23 Consulting, we're talking about Trent Pool circulating
24 for Donald Trump?

25 Q. And she said, you know, you have witnesses. At

1 the time I was hoping that Andy Maul would be a
2 witness, although he actually told me that he would
3 never circulate a Trump petition and I respected that.
4 I didn't know that he wasn't going to be, but I hadn't
5 found that out until after I talked to the local
6 Republican Party, and then she'd already pulled the
7 contract, so.

8 Q. She pulled the contract from who? You or ---?

9 A. From me.

10 Q. So you were fired for what?

11 A. Fired within a day of getting the packet. So I
12 went to go pick up all the petitions, had everything
13 ready, met with them, got a map of the district, got
14 everything good, even had a list of the district and
15 then go home, get everything ready, I was going to
16 start circulating actually the next day, and the
17 contract got pulled. I got an e-mail.

18 Q. And what was the reason she gave you for firing
19 you?

20 A. The e-mail that I sent to the Allegheny Republican
21 Party.

22 Q. And what did you ask for?

23 A. I asked for interested Republican registered
24 voters who were interested in helping on candidates'
25 campaigns. I said candidates plural, because I didn't

1 want to give all my cards away. And then when they
2 asked what candidate I said, well right now it's for
3 the Trump campaign but it's very likely we'll have
4 other campaigns as well. And, I said, if we get
5 rejected at the door with a Trump petition, it's always
6 possible that the person who comes with us could have
7 in their back pocket the person that they support's
8 petition and try to qualify that candidate instead.
9 And I was completely fine with that. I thought that
10 that sounded pretty reasonable. Because that way we're
11 not wasting the door knock. And they didn't like that.

12 Q. Who didn't like that?

13 A. Edee didn't like me contacting the Party at all.

14 Q. Why didn't she like that?

15 A. She said, basically, don't trust any of the
16 Republican Party.

17 Q. So the Trump campaign fired you because you
18 contacted the political party for a witness?

19 A. Yes. And I guess I found out later that most of
20 the people there supported Marco Rubio, so that made
21 sense in hindsight. And you know, there's so many ---
22 there's a spectrum of Republicans, right? Not everyone
23 just because you're republican means you like Trump or
24 Marco Rubio or Ted Cruz or Rand Paul. You know,
25 you've got these little subsets and groups inside the

1 Party. And then after the primary it's everyone versus
2 the other side.

3 Q. Amy Strauss. Where did you find Amy Strauss?

4 A. Craigslist.

5 Q. And Amy Strauss was a circulator, or what ---?

6 A. She was a circulator. I mean a witness, and
7 originally that was the whole ---.

8 Q. So she was a witness?

9 A. She was a witness.

10 Q. She didn't do any circulations?

11 A. She didn't do any circulation, to my knowledge.
12 Now, I'll double check after reading that e-mail. I'm
13 not very sure --- I'm not 100 percent. I just want to
14 make sure that that's clear, but she was hired to be a
15 witness.

16 Q. And you deployed her --- how did you deploy her?

17 A. She was teamed up with Michael Alexander and Brian
18 Lyra, who came in from Massachusetts.

19 Q. So she was their anchor?

20 A. She was their anchor.

21 Q. And they worked on what petition drive?

22 A. They worked on the Ted Cruz petition drive for the
23 first two days, and then we had to transition them and
24 pivot them out of Ted Cruz for lack of a decent witness
25 in that district.

1 Q. Well, you said you had a witness. You had Amy
2 Strauss.

3 A. We had Amy Strauss.

4 Q. What happened with Amy Strauss?

5 A. She seemed great. I liked her. She seemed really
6 gung-ho and fired up on the phone. And then after the
7 first day I talked to Brian and Michael about it and
8 they said that she was insane. And I said, what does
9 that mean? And he goes, well, once we get to the door,
10 she starts talking to herself. And I said, but she
11 seemed so natural and normal on the phone, you know,
12 are you serious? And he goes, very. I was like, so,
13 on a scale of 1 to 10, how bad is it? And they said,
14 it's like a 15, man. So we gave it another day just to
15 see where they were at, and they produced 14
16 signatures, or whatever it was.

17 Q. So two professional circulators generated 14
18 signatures in two days? Three days?

19 A. Yeah, I believe that was the chain of events that
20 led me to pulling --- and I had to have an honest
21 conversation with the Cruz campaign about getting that
22 district done. They didn't have any people in the
23 district that could help us, didn't have any witnesses
24 they could source. I was running ads down in Philly
25 for that area. It just wasn't --- and the clock's

1 ticking. You have, by that time, we were on day --- we
2 had ten days. So, 18 signatures a day or 15 signatures
3 every other day is not going to get the 250 valid
4 needed.

5 Q. And you were working for a specific delegate? Or
6 were these signatures for Ted Cruz for president at the
7 state level?

8 A. Ted Cruz for president and his three delegates.

9 Q. And his three delegates.

10 A. All paid for by the campaign.

11 Q. And the Cruz campaign didn't have any witnesses to
12 provide you for that district?

13 A. No, they didn't. Now, I pushed and pried to get
14 as much information as I could for these areas but I
15 just --- when you have all the people running for
16 president, I mean, all the resources are just
17 completely diminished. You've got ten people running
18 for president and it's impossible to find people at the
19 time, and even in the Party, to go and do all this
20 stuff. So I'm sure that she was just as frustrated as
21 I was.

22 Q. Who is she?

23 A. Vonne Andring, the recruit campaign assistant.

24 Q. Oh, Vonne Andring is who was in charge of the Cruz
25 campaign in Pennsylvania?

1 A. Yeah. Me and Vonne had many talks about this.
2 Sorry.

3 Q. That's fine. So, she didn't have any witnesses
4 for you and you didn't have --- your advertising
5 efforts only produced Amy Strauss ---

6 A. Yeah.

7 Q. --- and Amy Strauss didn't work out because she
8 had apparent mental issues ---

9 A. Mental issues, yeah.

10 Q. --- and let me bore down on that. When she
11 started talking to herself did that hinder the
12 gathering of signatures?

13 A. Yeah. I mean ---.

14 Q. Now, what was the end result for that
15 congressional district? Did Ted Cruz's delegates make
16 it onto the ballot?

17 A. One of them did.

18 Q. One did?

19 A. I think Deborah Evangelou. Like I said, we had
20 about 15 or 16 signatures in that district for the
21 delegates and Cruz, and when we went to turn in
22 everything, we were all in the annex --- not the annex
23 building, the building across from it. We were all
24 waiting there at the turn-in day. A lady shows up
25 saying that she's 20 shy in that district. And I said,

1 what district, what's your name? And I remember that
2 that was --- she was kind of --- I guess it was --- I
3 don't know. God was looking out for us so I pulled the
4 petition, then I actually had exactly about as many as
5 she needed. So we pulled it out and gave it to her,
6 and she went and turned it in.

7 Q. So one of the Cruz delegates in that district got
8 onto the ballot because you had just enough signatures
9 for her to get onto the ballot?

10 A. Yeah.

11 Q. The other two delegates did not get on the ballot,
12 to your knowledge?

13 A. They did not. And we definitely --- I mean, we
14 basically --- that ended up going down to four
15 districts instead of five.

16 Q. So you lost ---?

17 A. I lost money. Yeah, we lost ---.

18 Q. You lost the Cruz district because Amy Strauss
19 could not complete her job as a witness? And you had
20 no other --- hang on. And you had no other witnesses
21 for that district?

22 A. Exactly.

23 Q. So you then had to pull Michael Alexander and Lyra
24 out of that district and then you re-deployed them?

25 A. Yeah. We didn't pull them --- well, we just sent

1 them to Philly and I started making calls because the
2 witness operation that we were doing predominantly was
3 focused in Pittsburgh area since I knew Pittsburgh
4 better than Philly for the Rocky campaign, so I started
5 sourcing witnesses for them, for Philadelphia, and we
6 got Kemitt Wilson.

7 Q. Now Kemmitt is the individual you testified
8 earlier about?

9 A. Yeah, the one who tried to get extra --- who got
10 extra money out of me.

11 Q. And he got extra money out of you how?

12 A. By refusing to sign his Decs.

13 Q. And Decs mean the affidavit?

14 A. Yes. Now thankfully we actually got his signature
15 at all, he could have refused completely and then we
16 would have lost all those signatures. So, I mean ---
17 and I am, it means, sucks to say it, I really am put in
18 at his mercy. At that point in time, those signatures
19 become as valuable as Kemmitt says they are.

20 Q. Because Kemmitt is the witness, he is the only one
21 that can affidavit --- he's the only one who can
22 execute the affidavit as a precondition for filing?

23 A. That's the fair market value when a campaign is
24 willing to spend 50 grand to get on the ballot and they
25 need those signatures.

1 Q. And those signatures were ---?

2 A. It's not fair, it shouldn't be a fair market value
3 but ---.

4 Q. And those signatures that Kemmitt notarized, what
5 petitions were they for?

6 A. Rocky De La Fuente.

7 Q. And that was for ---. I think your testimony
8 before, Rocky didn't actually get delegates, he only
9 was on the top line ballot?

10 A. Yeah. He was ---.

11 Q. Hang on. So Kemmitt was notarizing affidavits for
12 Rocky De La Fuente for Democrat president for the
13 distribution of state-wide delegates?

14 A. Yeah.

15 Q. And those were the signatures that he threatened
16 not to sign unless ---

17 A. Yeah.

18 Q. --- hang on --- unless you provided additional
19 compensation?

20 A. Exactly right.

21 Q. Which eventually you did?

22 A. I did. I had to.

23 Q. Now the witnesses, you said some of them didn't
24 show up sometimes. How often would a witness not show
25 up?

1 A. I'd say from the original responses we got, we
2 ended up getting like five people. We built that
3 network up to about ten through, you know, networking,
4 finding friends of friends. But every day, people were
5 not being able to work. Every day I had petitioners
6 who would sit either in our house --- or in a hotel
7 room, not working, because there wasn't an event going
8 on so we could have two boats on one anchor or because
9 they had no witness. Well, because they had no witness
10 and because there was no event going on where they
11 could --- where it made sense to have two petitioners
12 at one street corner with one witness.

13 Q. So every single day you had circulators sitting in
14 a hotel room doing nothing because a witness didn't
15 show up?

16 A. Exactly.

17 Q. And it doesn't make sense to have two people on
18 one anchor, two circulators on one anchor unless it was
19 a high volume?

20 A. It has to be high volume, yeah. Otherwise they
21 are just going to be competing for each other's money
22 and then it creates fights and it's not good.

23 Q. So it's just better to have somebody in a hotel
24 room watching The Price is Right, rather than ---.

25 A. Yeah, exactly. And then they get annoyed and then

1 they leave and that happened to a few of the guys.

2 Q. Who got annoyed and left?

3 A. I think Mark Gailey left, Milton Lucan left and
4 Bob Lynch eventually left.

5 Q. Mark Gailey, Lucan and who else?

6 A. Bob Lynch ended up --- Bob Lynch threatened a lot.
7 I think I finally got him in --- I think Milton stayed
8 the whole time actually. So it was Bob Lynch that
9 left. Bob Lynch was just getting fed up.

10 Q. So Lucan stayed even though he was frustrated?

11 A. Yeah. Lucan did stay.

12 Q. But Bob Lynch left Pennsylvania because of the
13 witness problem?

14 A. Yeah.

15 Q. Witnesses not showing up?

16 A. Yeah. And if he didn't, he threatened multiple
17 times and I kept promising him that we'd get more, we'd
18 get more, that kind of thing.

19 Q. And you ---.

20 A. I was playing with him because I really needed ---
21 in the event that I find a witness, I have to have the
22 manpower to go out with them. So I'm hoping and
23 praying every night that we get more people, but it is
24 what it is.

25 Q. And during that time when you had circulators

1 sitting in hotel rooms because there wasn't a witness,
2 you were actively looking for witnesses through this
3 advertising?

4 A. Every day.

5 Q. So Bob Lynch actually left Pennsylvania?

6 A. He did. That's what I remember

7 Q. Did Mark Gailey leave Pennsylvania?

8 A. Mark Gailey left, he had another reason to leave.
9 But it was definitely compounded with the witness
10 issue.

11 Q. But Lucan threatened, but he stayed?

12 A. Lucan, he's a team player. I told him look man,
13 just --- he basically stayed, but they were all so
14 annoyed. And by this time, moral was so low, it was
15 hard to get anyone really excited about anything. So
16 Milton I got to stay. I paid him to help me out.
17 Basically he was running --- notarized signatures to
18 and from location X and location B. He was helping
19 deliver signatures the night of turn in, stuff like
20 that. I was basically paying him for being on a ---.

21 Q. So you paid him extra money out of your pocket to
22 sort of keep him in Pennsylvania?

23 A. Yeah. He'd be like a courier and have more a
24 managerial role.

25 Q. So you didn't sort of make work for him to make it

1 worthwhile.

2 A. We needed the job done, but I mean I was just
3 trying to help him.

4 Q. And you kept him in Pennsylvania --- and you did
5 that because you wanted him in Pennsylvania in case you
6 could find a witness through your advertising?

7 A. Exactly.

8 Q. And that did not materialize?

9 A. Nope. We used the same witnesses that we pretty
10 much had.

11 Q. Now I have a note here, based on your prior
12 testimony, of witness walking away as soon as they said
13 no. They knocked on the door and the initial reaction
14 was no, I don't want to sign and a witness would walk
15 away. Who was that witness?

16 A. Did I testify to that?

17 Q. I think you did, yes. If you're not aware of
18 that, then we can't do that question.

19 A. I guarantee that's happened and they do.

20 Q. But you don't know, you don't personally know that
21 so you can't testify to that right now?

22 A. I guarantee you it's happened to me. But I
23 can't ---.

24 Q. In the context of Pennsylvania 2016, are you aware
25 of a witness always walking away at the first no?

1 A. Charles McConnville would do that a lot.

2 Q. Who's Charles McConnville?

3 A. He was one of the witnesses. One of the five
4 guys ---.

5 Q. Spelling?

6 A. M-C-C-O-N-N-V-I-L-L-E.

7 Q. M-C-C-O-N-N?

8 A. V-I-L-L-E.

9 Q. McConnville? What was his first name?

10 A. Charles. He was very acquiescent to the voters'
11 demands.

12 Q. Let's bore down on that. If I were a professional
13 circulator and I knocked on the door and said do you
14 want to sign a petition for Trump. And they said no.
15 How do you rehabilitate? How does a professional
16 circulator simply not say thank you and walk away, what
17 do they do?

18 A. Well you've got to be resilient, number one.

19 Q. And resilient means what?

20 A. You know with the bounce back. First of all,
21 don't go straight up there and pitch them like that.
22 You have to build rapport. There's different things
23 that you do. You say, pardon me, sir, are you a
24 registered voter here in the State of Pennsylvania? Or
25 no, since I'm going to their house, I'd probably have a

1 walk list. Hey guys, we are out here helping our
2 Republicans get on the ballot, you mind helping us with
3 a quick signature? And they say no, oh well, you know,
4 the Democrat machine out here is just killing us and
5 it's hard to find our guys at home during the day
6 because we're all busy working, making the dollar, and
7 that kind of thing. You start charming them, that's
8 what you do. McConnville, if he starts walking away
9 down the street, then I have to go chase him and then
10 the guy is looking at me like we're crazy. Oh like,
11 what the hell are you doing? Oh okay, good, you left.
12 Oh, you're coming back after I told you to leave. Yeah,
13 that's not going to be very good.

14 Q. So it's your testimony that a professional
15 circulator, one of their skill sets is the ability to
16 turning an initial no ---. First of all, they pry the
17 pulpit by sort of asking them preparatory questions
18 before you get the ultimate question of do you want to
19 sign?

20 A. Uh-huh (yes).

21 Q. And they say no, then you provide them with
22 additional information and a pep talk to sort of get
23 them on your side to sign.

24 A. Yeah. There's a million --- you know, it's just
25 like any sales job that you've ever heard of. I'm sure

1 everyone here has been in some sort of sales role in
2 college or something.

3 Q. I have not.

4 A. Well I mean, when you get rejected, there's ways
5 of handling rejection. And you have to be resilient
6 enough to bounce back and utilize some of them. That
7 trick where I said well, Hilary Clinton and Bernie
8 Sanders are out here getting all the signatures in the
9 land. You know, it's hard finding our guys at home
10 because everyone is out there working since we're not
11 on welfare, stuff like that. You say those little
12 tricks and that gets them started and then they start
13 getting happy and you make them laugh once or twice and
14 maybe they'll give you the signature. But if the
15 witnesses walked off and your anchor has already left
16 and they are halfway down the block, that signature is
17 no longer valid. Does that make sense?

18 Q. Yeah, it does; yes.

19 A. And a lot of times, people don't have that ability
20 to handle rejection. There's a lot of people that
21 aren't good salesmen, but they're more than happy ---.
22 They don't want to do the petitioning job, they don't
23 want to do the speaking job. But they are more than
24 happy to watch the petition job being done and sign off
25 on it, but they don't want to be the talker. Now when

1 they are in a prone, non-aggressive role, and
2 aggressive meaning you are on someone's property, it's
3 one thing. If you're at a street corner or something,
4 that is neutral ground, that's not --- when you are on
5 someone's property, they become a lot more acquiescent,
6 fearful and it's a lot harder to get those signatures
7 with someone who is not able to roll with the punches.
8 Does that make sense?

9 Q. Yeah, it does. So it's your experience that
10 witnesses only do the witness job because they do not
11 want to engage voters, they just want paid for their
12 time?

13 A. Yeah.

14 Q. And while they may be willing to stick with a
15 person on a street person who initially says no,
16 they're less --- in your experience, they are less
17 likely to stick around when they are on someone
18 property?

19 A. Yeah.

20 Q. Because that's ---.

21 A. Because it's a lot more aggressive than passive.
22 If they're doing it with a passive witness, it's one
23 thing. If they are doing an actual on property, it
24 requires a whole different type of witness and those
25 guys are almost impossible to come by because they are

1 probably already making a lot of money in sales. Or
2 doing something that requires an extra, third person.

3 Q. Getting a signature has to be a valid signature;
4 correct?

5 A. Yeah.

6 Q. The goal isn't simply just ink on paper, it's
7 validating on paper. These requirements if they are
8 registered voters of the Party that they sign within a
9 legal time period and that they complete the petition,
10 signature requirements in full; correct?

11 A. Yes.

12 Q. That's the goal; correct?

13 A. Yes.

14 Q. And when you are talking about --- like we're
15 talking now about presidential elections, so these are
16 party nominations, which is the best way to get a valid
17 signature? Is it door to door with a street list or on
18 a corner?

19 A. To get a valid signature?

20 Q. Yeah. To get a valid signature.

21 A. It's going to be --- it depends on who you use.
22 If I have Jake Witmer and Andy Jacobs and Trent Pool's
23 running around and pretty much most of the guys I
24 hired. Michael's got high validity. Milton, you know,
25 Bob, they all have really high validity. So that's why

1 we use them. All those guys are great, so that seems
2 awesome. But I mean, when I'm doing a general 10,000,
3 130,000 signature drive, the best way is always going
4 to be going door to door.

5 Q. And why is that?

6 A. Because you know that those people are who they
7 are and that they live at that place. It's so much
8 easier to get a valid signature.

9 Q. And you say you have a street list. Do you know
10 that these people are registered voters?

11 A. Yeah. You're using the voter scrolls, getting
12 them from the Secretary of State's office.

13 Q. So going door to door gives you the certainty that
14 the person who is signing is in fact a registered
15 Republican and that their validity can't be challenged
16 based on their registration status?

17 A. It doesn't mean that they can't be challenged. If
18 they wrote something incorrectly, sometimes they do.
19 But it will knock it off.

20 Q. But it's only on the basis that a registration
21 status that that's a lock.

22 A. Yeah. That's a lock, we know they're a registered
23 voter.

24 Q. As opposed on the street corner, you really don't
25 know if you are being lied to or not by the signing?

1 A. Yes, that's true. Some people are also
2 embarrassed to admit that they are not registered
3 voters. Especially in a group of people, getting some
4 elderly people. Yeah, we're all registered; oh sure,
5 we'll help you, honey. And you look them up and not a
6 single one of them is registered. No one wants to
7 admit it.

8 Q. And in those --- so your testimony is that
9 witnesses become more timid for presidential elections
10 where it --- strike that, terrible question.

11 So it's your testimony that while going door to
12 door is the best way to get a valid signature, it is
13 also the most difficult situation for witnesses to
14 stick with you?

15 A. That's true.

16 Q. Let's compare and contrast a little bit, over at
17 Pittsburgh.Org, you brought in 25 people to work
18 OpenPittsburgh.Org's petition drive?

19 A. Uh-huh (yes).

20 Q. And you did not have to use witnesses for that
21 drive; correct?

22 A. That's correct.

23 Q. And your production was how many in three days?

24 A. We had over 6,000.

25 Q. What was your total production for the

1 presidential --- 2016 presidential petitions?

2 A. In about 18 days for Rocky, we were able to get
3 4,500 signatures.

4 Q. And what about for Cruz?

5 A. That's with about 10 to 12 petitioners in the
6 state.

7 Q. And what about for Rocky --- I mean what about for
8 Cruz?

9 A. Cruz, we were able to get three congressional
10 districts done.

11 Q. Total?

12 A. So three times 600, 1,800 signatures in about two
13 weeks.

14 Q. So in 18 days you got about --- so in three days,
15 roughly, at OpenPittsburgh.Org you got roughly the same
16 amount of signatures that you got in 18 days of
17 circulation in Pennsylvania for presidential petitions?

18 A. That's a very accurate statement.

19 Q. And that probably was the result of several
20 factors; correct?

21 A. Yeah.

22 Q. One, you were able deploy more people at Open
23 Pittsburgh than in Pennsylvania for the presidential
24 election?

25 A. Yes.

1 Q. And that is a direct result of you not having
2 enough witnesses for Pennsylvania president?

3 A. Yeah. Once they throughout the out of state
4 circulator requirement and if they would have given us
5 the emergency relief we would have gotten the state ---
6 I probably would have gotten Cruz on every --- every
7 district as many delegates as you wanted. We would
8 have collected all 35,000 signatures that he needed.

9 Q. So you're talking now about Cruz for president?

10 A. Cruz for president.

11 Q. You could have deployed more professional
12 circulators for him had I been able to get the
13 emergency relief?

14 A. Exactly. And he probably would have had more
15 delegates elected and might have had more chances of
16 doing better at the convention.

17 Q. So this is all my fault? Okay.

18 A. But also, Rocky's petition would have gone a lot
19 smoother. There was a lot of hiccups in that. That
20 collection effort ---.

21 Q. Let me ask you a question, Rocky, Democrat, 2016.
22 Describe that petition drive.

23 A. It was just a rollercoaster, man. It was constant
24 gardening, constant making sure --- I mean I've never
25 spent more time trying to get these witnesses to show

1 up and do the job that they've been hired to do.

2 Q. So your prior testimony that every single a
3 witness didn't show up --- that wasn't just Ted Cruz,
4 that was ---.

5 A. No, Ted Cruz ---.

6 Q. Hang on, let me ask my question. That was for Ted
7 Cruz and for Rocky. When you said somebody didn't
8 show, you were talking about Cruz and Rocky?

9 A. Talking about mainly --- just Rocky. Cruz's
10 people --- we had Cruz done. They were always limited
11 to just the witness or the delegates doing the
12 petitioning.

13 Q. So it was the Rocky delegates, it was the Rocky
14 witnesses which were the bigger problem?

15 A. They never showed up, yes.

16 SHORT BREAK TAKEN

17 BY ATTORNEY ROSSI:

18 Q. In case I didn't ask this question before, you
19 found Amy Strauss through Craigslist; correct?

20 A. She was a Craigslist person.

21 Q. Let's clean up the record a little bit. Your
22 earlier testimony was that you were the only person
23 that Rocky used in Pennsylvania for Democrat, 2016?

24 A. Yeah. Shawn and then Shawn hired me.

25 Q. So Shawn had the exclusive contract in

1 Pennsylvania?

2 A. That's correct.

3 Q. And you were a subcontractor of Shawn Wilmar
4 (phonetic).

5 A. I think he had hired someone to do it before me
6 but that guy --- I never got any signatures from him.

7 Q. And let me remind you not to --- because I had a
8 discussion with the court reporter. Wait for my
9 question to be asked and then answer, I will try not to
10 talk over you because I have the same problem.

11 A. Okay. Sorry.

12 Q. How many signatures --- if I want to be on
13 Pennsylvania's ballot for president of the United
14 States, even though I would lose. If I wanted to have
15 every delegate and every alternate slot filled in every
16 congressional district, and be on the statewide ballot,
17 what is the minimum number of signatures would that
18 require?

19 ATTORNEY JOEL:

20 Can you read that back, I got lost in the
21 middle of it?

22 ATTORNEY ROSSI:

23 I can rephrase the question if you'd
24 like.

25 BY ATTORNEY ROSSI:

1 Q. Strike that, let me start over. Rocky De La
2 Fuente, strike that.

3 Ted Cruz was running for president of the United
4 States in 2016 for the Republican nomination for
5 president. If he had --- how many signatures would it
6 take to place every delegate and every alternate
7 delegate slot available to him in Pennsylvania as well
8 as be on the state's top line for president?

9 ATTORNEY JOEL:

10 Object to the form of the question.

11 A. I agree.

12 BY ATTORNEY ROSSI:

13 Q. How many signatures does it take to get on --- how
14 many signatures would it take to have a full slate of
15 delegates, alternate delegates and to appear on
16 Pennsylvania's ballot for president of the United
17 States?

18 ATTORNEY JOEL:

19 Same objection.

20 BY ATTORNEY ROSSI:

21 Q. Let's break this down then. What is the minimum
22 number of signatures it takes to become a delegate, to
23 appear as a delegate in Pennsylvania?

24 A. 250.

25 Q. In your experience, how many raw signatures does

1 it usually take to be comfortable that you have enough
2 ballot signatures?

3 A. Going door to door you can do it less, but most
4 campaigns don't do it for less than 400?

5 Q. 400?

6 A. Trump was buying 450.

7 Q. So each delegate requires 450?

8 A. Something like that.

9 Q. Yes?

10 A. Yes.

11 Q. How many delegates are in each congressional
12 district?

13 A. Three delegates, three alternates, so six.

14 Q. And were talking about the Republican
15 presidential?

16 A. Republican presidential. It's the same as
17 Democrat though.

18 Q. So to get a full slate of delegates and alternates
19 in each congressional district requires 450 times six?

20 A. Yeah. I'd say about 2,000 to 2,400, somewhere
21 around here.

22 Q. My math comes to 2,000.

23 A. Yeah. At the high end I think you are looking
24 about 2,700 to 3,000.

25 Q. Is it your testimony that 400 to 450 gets you on

1 the ballot?

2 A. Yeah. I'd say that would be pretty good.

3 Q. So anything more than 450 is surplus?

4 A. Yeah.

5 Q. Anything less than 400, you really risk not being
6 on the ballot.

7 A. Yeah. Depending on how you do it. If you're
8 going door to door, obviously you're going to come away
9 with less signatures.

10 Q. Going door to door, what is the recommended number
11 of signatures you get?

12 A. Cruz campaign wanted me to go to 275 and I thought
13 that was kind of crazy. I was concerned for their
14 sake.

15 Q. So 275 times 6 is?

16 A. Fifteen (15) ---.

17 Q. 1,650. So Cruz thought that 650 (sic) signatures
18 per congressional district would get him a full slate
19 of Republican delegates and Republican alternates on
20 the ballot?

21 ATTORNEY JOEL:

22 Object to the form.

23 A. Yes.

24 BY ATTORNEY ROSSI:

25 Q. Let me rephrase that. Is it your testimony, Ted

1 Cruz contracted for 1,650 signatures per congressional
2 district?

3 A. No, they contracted me --- the only wanted me to
4 do the delegates.

5 Q. So 825? But a candidate came to you and wanted
6 you to circulate petitions for three delegates and
7 three alternates in a congressional district, you would
8 recommend to a campaign that they pay for how many
9 signatures?

10 A. 1,875.

11 Q. And that's what Ron Paul did in 2012?

12 A. Mitt Romney, all those campaigns did that.

13 Q. And that's if you go door to door?

14 A. Well, you're not going to do 400 door to door.
15 You're going to get about 325 max door to door. 325
16 per delegate. But still you're looking at 1,800 raw
17 signatures, per CD. Multiple that by 18. You're
18 looking at well over 20,000, I would say probably about
19 35,000 signatures per presidential campaign that need
20 to be gathered in the three-week period.

21 Q. So it's your testimony that in order for a
22 presidential candidate to have a full slate of
23 delegates and alternates as well as appear on the
24 Pennsylvania ballots requires about 35,000 signatures?

25 ATTORNEY JOEL:

1 Objection to form.

2 BY ATTORNEY ROSSI:

3 Q. How many signatures does a presidential candidate
4 need in Pennsylvania to have a full slate of delegates
5 and alternates in a presidential election --- primary
6 election?

7 A. 35,000 and probably up to 40,000. I wouldn't be
8 surprised if Hilary Clinton or somebody really popular
9 like that got more than that.

10 Q. Now in addition to those signatures, in order to
11 appear on the state's top line as the presidential
12 preference primary, where their names actually appear
13 untethered to delegates; how many signatures does that
14 require?

15 ATTORNEY JOEL:

16 Object to form.

17 BY ATTORNEY ROSSI:

18 Q. How many signatures does it take for a
19 presidential candidate to appear on Pennsylvania's
20 presidential primary ballot?

21 A. 2,000 ballot but you'll always double that like we
22 did for Rocky to turn in 4,800 or something, I can't
23 remember what it was. When I said 35,000 to 40,000
24 that includes that number. So that's 4,000 for them
25 and pretty much, the bare minimum about 300 per

1 congressional district gets you about 35,000 raw
2 signatures.

3 Q. So the 35,000 signatures that you are saying is
4 required includes all delegates, all alternates and the
5 states presidential preference primary?

6 A. Yes. With not much ---.

7 ATTORNEY JOEL:

8 Object to form. You can answer.

9 BY ATTORNEY ROSSI:

10 Q. You can answer the question.

11 A. And that doesn't give you much cushion because you
12 are only going to have 50 signature cushion for the
13 delegates. So that's giving 300 signatures per
14 delegate alternate, which is 1,800. Divide that by 18
15 and you're looking about 30-something thousand there.
16 Add the 4,000 for the presidential candidate. So
17 that's what most campaigns are coming to Pennsylvania
18 ready to buy. So it's a very expensive endeavor
19 getting all those signatures.

20 Q. Now breaking that down, how many signatures can
21 you get --- if a nominating petition is filled with
22 signatures, how many signatures does a nominating
23 petition contain in Pennsylvania?

24 A. Can I look at an exhibit? I think ---.

25 Q. That is in the exhibit. What exhibit is ---?

1 A. It's like 5, 6 or 7, I can't remember.

2 Q. I'm showing you Defense Exhibit 6.

3 A. So we have 30 lines on Defense Exhibit 6. So the
4 nominating papers we circulated for Rocky this
5 summer ---.

6 Q. We're talking about petitions right now.

7 A. Okay, we're talking about petitions, so 30.
8 Thirty (30) lines ---.

9 Q. Thirty (30). And this petition is generated by
10 whom?

11 A. The Secretary of State.

12 Q. And how do you generate that petition?

13 A. You go online. I found this out in the lawsuit,
14 it's actually a pretty cool system that they have. You
15 type in all your information and it kind of produces it
16 for you, which is pretty ---. It's helpful for a
17 candidate to have that.

18 Q. And to your knowledge, you are required to use
19 this petition? The format provided by the Secretary of
20 State.

21 A. Yeah. You definitely are.

22 Q. So the maximum number of signatures any petition
23 page can contain is 30 signatures in Pennsylvania?

24 A. Yes. For this year, that's all I can testify to.

25 Q. How often is a petition page fully utilized?

1 A. This one right here --- I mean this one went to
2 22. They're not all --- very rarely. When the
3 candidate is doing it himself you'll see that it's more
4 filled out. When you have pros doing it themselves,
5 it's more filled out. But, you know, you're never
6 going to have --- it will be probably, I'd say, you'll
7 have about 90 percent of the pages filled out. On the
8 low end --- it's cringing, I cringe so many times when
9 I have to pay a \$5 notarization for one signature on
10 the page. But you have to do what you have to do.

11 Q. Let me ask you that, if you have a petition ---
12 nominating petition with one signature on it, will you
13 bother to have it notarized and filed?

14 A. That's a hard question. Sometimes we don't, we
15 just throw them away.

16 Q. Do you notify the signor that their signature is
17 not being used?

18 A. No, I don't think you do. I think we just --- I
19 think the way we've done it, is we'll file them
20 un-notarized or just try to stick them in and say hey,
21 you know --- and they won't count them. But then
22 they'll get thrown away. You don't want to
23 disenfranchise the butter, but I don't want to pay five
24 bucks when I don't need to.

25 Q. When you file nominating petitions, you file them

1 with Secretary of State's office for statewide
2 counties?

3 A. Yep.

4 Q. And so the Secretary of State's office goes
5 through the petitions; correct?

6 A. Yes.

7 Q. And they will strike any petition's signature that
8 is not valid on its face?

9 A. Yes.

10 Q. Okay. And do they do the same thing for the
11 petition themselves?

12 A. Yeah.

13 Q. So if something's not notarized, they throw ---
14 they whole petition is thrown out; correct?

15 A. Yes. And that's your experience?

16 Q. Yeah, the example we had from one of the exhibits
17 about the --- I guess there was a facially --- facial
18 error with the affidavit or the execution, so they
19 threw them out en masse, in bulk. And you have
20 personally yourself on occasion actually filed
21 petitions with the Secretary of State's office? Have
22 you?

23 A. Yeah.

24 Q. So you know this process from personal experience?

25 A. Yeah.

1 Q. So based on the math, 35,000 signatures, if that's
2 the minimum number, divided by 30 is 1,160 petitions.
3 Okay. So based on your number --- and we're going to
4 have Secretary of State's office testify to this at
5 some point.

6 A. Okay.

7 Q. As to what the actual numbers are, minimum numbers
8 of petitions that need to be filed and signatures need
9 to be filed for each delegate, for each alternate, how
10 many there are in the state and how many they need or
11 so. We're not going to go over --- we're simply
12 relying on your testimony. This is just for
13 informational purposes. If it's 35,000 divided by 30,
14 in a best case scenario, my math comes to 1,160
15 nominating petitions that need to be filed for a
16 presidential candidate. And then what is your
17 experience --- how much does it cost you to get a
18 petition notarized in Pennsylvania?

19 A. Never less than \$5 and sometimes more when you add
20 in all the, you know --- there's a lot of issues with
21 the notaries you get online, they always charge you
22 more than that because ---.

23 Q. Are there situations where you can get it for
24 free?

25 A. No. I mean, in Pennsylvania, no. I've maybe

1 gotten a few, but things are pretty strict about this.
2 You know, Pennsylvania is the worst state in the
3 nation, hands down. I mean, I've never been to a state
4 --- candidates expect to come here with \$5,000 or
5 \$6,000 as a backdoor filing fee, prepare to paid their
6 petitions. Cruz's campaign gave me \$1,000 for three
7 districts and we ended up going to \$1,500, \$1,600. I
8 mean it's insanity.

9 Q. \$1,500 or \$1,600 ---.

10 A. I'd have to look at the actual invoice, but we had
11 over \$1,000 in notarizations.

12 Q. Okay. You had \$1,000 in notarization fee for how
13 many congressional districts?

14 A. Four, three or four. However many.

15 Q. And you actually spent that money?

16 A. Yeah.

17 Q. On the affidavit?

18 A. Oh, yeah.

19 Q. Three or four congressional districts?

20 A. Three or four, yeah. And that's only three
21 delegates in each one.

22 Q. Did he bother with alternates?

23 A. No, he didn't. Okay. So he came pretty late in
24 the game. So they were just --- I asked him, you know,
25 finding these guys --- they didn't even have like a

1 delegate recruitment plan. So they were kind of a
2 little disorganized and they weren't prepared for all
3 that. But some candidates are, you know.

4 Q. So is it your testimony that you can sometimes get
5 free notarizations?

6 A. Never in my experience. I may have gotten a few
7 free notarizations from a bank, but my bank is Wells
8 Fargo. It's impossible to find a Wells Fargo in
9 Pittsburgh. You can't find a Chase in Pittsburgh. You
10 can't find any bank other than the ones they have
11 there. I think someone said there's 80,000 notaries in
12 Pennsylvania. I googled so many times 24/7 notary,
13 there's like one or two ads that pop up. And then none
14 of them will ever work past certain hours. My
15 petitioners are working late. It's crazy, you know.
16 Getting a notary after 5:00 p.m. is almost impossible.
17 And when you find one --- we found one guy who's
18 willing to do it, but his kids go to bed at a certain
19 time. My petitioners don't get done until late. It
20 was problematic. And for me, I want the petitions
21 notarized every day, because I don't want --- things
22 that happened where they don't show up or someone not
23 showing to notarizing the petitions on the last day.
24 So I want them notarized and turned in to me. And
25 also, that's when my petitioners want to do it too,

1 because then they get paid. So I'll give them a check
2 or money or whatever I have to do to make sure that the
3 signatures are compensated for. It's best business
4 practice to have all of that paperwork and stuff done
5 on each night so I don't have to wait around or run the
6 risk of not getting it notarized on the last day.

7 Q. Okay. You said you found somebody who would
8 notarize after 5:00 in Pittsburgh?

9 A. Yeah, Jay Risner (phonetic) was his name. We have
10 a bunch of receipts from him. He was a pretty cool guy
11 in Squirrel Hill.

12 Q. Okay. How much did he charge per affidavit?

13 A. He charges \$5, which was typical. And he was
14 working for --- I can't remember his employer's name.
15 He was charging us \$5 and then he was also charging a
16 service fee. You know, how many miles he had to drive,
17 what's the inconvenience, what time.

18 Q. Jay Risner. Okay. Did he have a physical
19 location you could go to to have your petitions
20 notarized?

21 A. He had a house, but like I said, he had a daughter
22 and when she's in bed, you know, you can't be there
23 after a certain time. It was like 8:00 or 9:00. And
24 he was getting angry, too, that we were coming in.
25 Because I would send five or six guys there at 8:00, or

1 the cutoff, and then he's there doing the notarization.
2 He started getting annoyed with us.

3 Q. So the process of notarization takes a certain
4 amount of time to conduct?

5 A. The longest time ever. I mean you're circulating
6 --- you're signing off on every page that is
7 circulated. If you have ten pages, it could take a
8 minute, two minutes per page. They also have paperwork
9 on their end, I don't know what it is in Pennsylvania.
10 But notaries have certain requirements that they have
11 to follow and the petitioner --- everything's got to be
12 done according to the laws of the notarization.
13 License is required, the guy probably has to put it in
14 his book or something along those lines. They've got
15 to make sure the stamp is done, everything is done
16 correctly and then they --- hopefully they don't mess
17 up. Because if they mess up and the signatures are
18 invalid, the whole process is a waste of everyone's
19 time.

20 Q. Now this Jay Risner, would he ever come out ---
21 strike that.

22 In your experience, were there any notaries that
23 actually come to you to do the notarization?

24 A. He was the one we found after calling everyone.

25 Q. And when he came to you to notarize, it was still

1 just \$5 a notary?

2 A. No. It was always more than \$5 a notary. That
3 was what he charged per stamp. But then he had a fee
4 associated with mileage, a fee associated with his time
5 and a fee associated with the service provided.

6 Q. And what were those fees?

7 A. I think it ended up being a \$40 extra charge.

8 Q. \$40 per travel to somebody to notarize?

9 A. I think so. Something along those lines, I'd have
10 to look.

11 Q. What was the utility having the notary come to you
12 out in the field?

13 A. Well it doesn't slow down the petitioners. If
14 they have to drive Pennsylvania, you guys got all the
15 crazy hills. There's roads in Pittsburgh that are not
16 done to a grid system. So anyone from out of state or
17 a petitioner coming around and trying to move around
18 there, even with their witnesses it's kind of hard to.
19 I'd say it probably takes them about 30 to 45 minutes
20 to move from the petition location to the guy's house
21 and then you have to give them another 30 minutes or so
22 just to get their stuff, their paperwork process with
23 him. So you're talking about probably an hour to an
24 hour and half of down time per petitioner group or per
25 petitioner team just to get the stuff done.

1 Q. And you want this done daily so that you don't
2 lose witnesses ---

3 A. Oh definitely.

4 Q. --- who are the people who have to execute?

5 A. In our experience, the witnesses weren't showing
6 up so it was even more risky to not have them notarized
7 each and every day. When we started having petitioner
8 issues, or witness issues not showing up, I started
9 thinking well, that's not good and we need make sure
10 it's per day so it doesn't mitigate against anything
11 happening to the signatures we've already gathered. So
12 we started doing it every day, especially towards the
13 last week of the drive.

14 Q. And so when you found Jay Risner and you realized
15 that he would come out to you, you utilized that
16 service?

17 A. Yep. We definitely did.

18 Q. And is it your testimony --- so saving time
19 traveling to a notary after hours allowed you to
20 collect more signatures?

21 A. Yes.

22 Q. In states where there are not notaries, are you
23 able to circulate for longer periods of time?

24 A. 100 percent, so yeah.

25 Q. So let me clarify my question. In states that

1 don't have a notarization requirement, are you able to
2 circulate petitions per day for a longer period of
3 time?

4 A. Yes. You're much more productive in states
5 without a notarization requirement.

6 Q. In addition to the expense, there is an efficiency
7 issue with respect to the notarization in your
8 estimation?

9 A. Yes. There definitely is.

10 Q. And so when you found Jay Risner, was it worth the
11 \$40 for him to come out because you could get --- you
12 make enough money to compensate you for the extra
13 service fee on signatures?

14 A. Yes. Jay Risner was mainly for the Rocky stuff.
15 The other guys found theirs in different areas for
16 Cruz. I'm not sure --- they all --- one guy said it
17 was over \$1,000. But Jay Risner was convenient because
18 he was the only person who answered their phone in
19 Pittsburgh. But he wasn't the best because he wouldn't
20 leave his house. So we had to go to him regardless.
21 He would leave his house before 5:00 p.m., after 5:00
22 p.m. his daughter is with him, he wouldn't leave his
23 house. We had to go to his house. It became kind of
24 --- I mean what do you do. You need a notarization
25 late at night, none of my guys have any of the banks in

1 Pittsburgh. You're pretty much at a loss for getting a
2 notarization for free.

3 Q. So Jay Risner's mobile service was before five
4 o'clock?

5 A. Basically.

6 Q. After five o'clock you had to go to his house.

7 A. Yep.

8 Q. Would he notarize documents at 1:00 a.m.?

9 A. No, he would not.

10 Q. What was the cutoff?

11 A. Pretty much about 9:00. And the other thing is
12 too, the petitioning window that envelope of time for
13 the best production and output for a petitioner is 5:00
14 to about 9:00 when people are off work, at the store,
15 going to get groceries or whatever. That's when you
16 want your guys working. You don't want them going and
17 trying to meet Jay Risner --- it really starts about
18 3:30.

19 Q. The peak production period is --- what is the
20 prime time for signature gatherers in Pennsylvania?

21 A. It's in the morning from 6:00 a.m. to about 9:00.
22 Work from your breakfast location, work from your
23 store, work from the gym and then it's 4:30 to about
24 9:30.

25 Q. How difficult is it to find a notary after 5:00?

1 A. After 5:00 it's pretty darn hard. You're going to
2 have to use one of the services that I mentioned, like
3 a Jay Risner.

4 Q. Are there mobile services everywhere in
5 Pennsylvania?

6 A. No.

7 Q. How many after hour notaries did you use in
8 Pennsylvania?

9 A. Just that guy. We called multiple people. And we
10 really started getting kind of worried. I was trying
11 to find libertarian friendly people, all people that I
12 could network with just to find someone who is willing
13 to be at our beck and call. It was getting to be kind
14 of --- I was worried that the guy was getting kind of
15 mad with people showing up randomly. I would text my
16 people, this is the guy, this is the number, this is
17 where you go by 9:00. They would show up at 11:00. He
18 got pretty furious at us. And rightfully so, but my
19 guys they're not thinking like that guy is. They're
20 just going and showing up to get this stuff notarized.

21 Q. So at some point in time Jay was --- you began to
22 overwhelm him?

23 A. Yeah. We overwhelmed him. He was pretty flexible
24 with us and he did end up --- I think he ended up
25 staying on with us through the drive but I'd basically

1 be pretty nice to the guy.

2 Q. You ultimately were able to get everything
3 notarized; correct?

4 A. Yes.

5 Q. But at a cost of signatures?

6 A. Oh they cost. They cost us signatures and they
7 cost financially.

8 Q. Let's talk about the notary. I'm going to refer
9 you to Defendant's Exhibit 6. Can you read the
10 affidavit circulator into the record, please?

11 A. I do swear or affirm that I am a qualified elector
12 of the Commonwealth, duly registered and enrolled as a
13 member of the political party designated in this
14 nominated petition. That my residence is as set forth
15 below; that the signers of the foregoing petition sign
16 the same with the full knowledge of the contents
17 thereof. That their respective residences are
18 correctly stated therein. That each sign on the date
19 set opposite his or her name. That to the best of my
20 knowledge and belief the signers are qualified
21 electors, duly registered and enrolled members of the
22 political party and of the political district
23 designated in the petition. And that they are
24 residents of the county specified in number one below.
25 Number one is Allegheny --- or county petition signers.

1 Q. That affidavit --- your testimony is that when you
2 get a --- in Pennsylvania the witness, the in-state
3 witness has to execute the affidavit; correct?

4 A. Yes.

5 Q. And your prior testimony is that you advertised
6 and found witnesses in Pennsylvania; correct?

7 A. Yes.

8 Q. And you trained them on how to execute the
9 affidavit?

10 A. Yeah. We would read through the complete
11 petition, the different components of and then --- well
12 this one --- obviously not he nominating paper mailing
13 because there's five parts to it, A, B, C, D, E. This
14 would have basically make sure that the add-on was
15 reading that with us and go through it and say.

16 Q. So to the best of your knowledge, you trained each
17 witness as to what they were swearing to?

18 A. Yeah. We would have them read it and we would go
19 through it line by line and they would say, okay. And
20 then the understanding of why they are doing what their
21 job is.

22 Q. Based on your experience in Pennsylvania, were any
23 witnesses confused as so what it was they were
24 executing?

25 A. Yeah. I think most of them were. I think all

1 witnesses were kind of like --- you know, the language
2 isn't --- for a person off the street, it's not very
3 colloquially or in laymen's terms. But ones we go
4 through it line by line and make sure that they're
5 understood, it becomes a little bit more --- it is an
6 opaque --- I would say that this it's a very opaque
7 statement. I'm a qualified elector of the
8 Commonwealth. In their eyes, I could be a qualified
9 elector. Who knows what --- they're not lawyers and
10 going and looking up what a qualified elector is.

11 Q. Did you ever have any situation where a
12 circulator, an out-of-state circulator executed the
13 affidavit?

14 A. I think Michael Jennings might have executed some,
15 and I talked to you about this last time. I'm not sure
16 but we had --- when we went through all these
17 processes, everyone knew except Michael and maybe two
18 other guys who had never done it before in
19 Pennsylvania, but they've been around enough. So
20 Michael, I think, was the only one who was confused
21 originally. I think he executed the first day at the
22 notary some signatures and I asked Michael, why are you
23 executing? I love Michael to death, but he's not the
24 sharpest tool in the shed. I said were paying John or
25 whoever it was as witness, is going around with you,

1 why are you executing the document? The whole purpose
2 of him is to do that while you go and petition. And it
3 became clear. People are confused, I would be confused
4 if I had never done it before. He was from LA;
5 California doesn't have notarizations. It's a beast
6 unto its own.

7 Q. Was this the first time that Michael Jennings was
8 in a state where he couldn't execute the petition?

9 A. Yeah. This was his first time.

10 Q. So he wasn't clear what the role of the witness
11 was?

12 A. Yeah.

13 Q. And he wasn't clear that he couldn't execute the
14 affidavit at first?

15 A. Yeah. We talked to him and figured it out but it
16 was kind of a --- on top of that some of the witnesses
17 were kind of questioning what their --- they didn't
18 understand. I would read it with them and explain it
19 to them and we're moving quick, but when they got to
20 actual notarization, they were like oh yeah, okay.
21 I've got to --- and they were slow moving. It doesn't
22 resonate with people until they actually get it done
23 and do it and then they're like okay, that makes sense.
24 Q. So you would have trouble the first time around
25 with people as they learned how to do it?

1 A. Yeah. Exactly.

2 Q. Witnesses and circulators?

3 A. Yes, witnesses and circulators.

4 Q. When you discovered Michael was executing these
5 affidavits, you instructed him not to; correct?

6 A. Yeah. We instructed him not to. I can't remember
7 if we turned them in or not.

8 Q. Did you file any of these? Did you personally
9 file any of these petitions?

10 A. No. I didn't file Rocky. We did with Cruz, but
11 I'm pretty sure we didn't file them. I can't remember.

12 Q. Did you have any witnesses that improperly
13 executed the affidavit?

14 A. I very likely.

15 Q. But you don't know?

16 A. I have no clue. I just know when I was given the
17 pages after they had been executed, I would make sure
18 just to read --- to make sure to the best business
19 practices I can that the stamp on the notary commission
20 wasn't expired, things like that. I would say okay,
21 everything looks good and put it in our pile. But I
22 didn't go through it with a fine tooth comb and make
23 sure everything --- you know if I say Michael James
24 name on it, that's when I was like oh, you know, this
25 is not happening. So we would --- we would at least

1 solve the problem.

2 Q. Did you review these petitions on a daily basis as
3 they came into you?

4 A. Yes, semi-daily.

5 Q. So you discovered Michael's error early on?

6 A. Yeah. Within the first few days.

7 Q. How did he react when he was told that he couldn't
8 execute the affidavit.

9 A. I don't know if he even understood what was going
10 on --- like I said the guy is awesome but he's not the
11 smartest person. He started to understand more --- you
12 know it's kind of a different beast, Pennsylvania
13 versus California so I gave him the benefit of the
14 doubt. But we just made sure everything --- he reacted
15 kind of like, what, what's going on, why are we doing
16 that? He understood eventually. It's pretty self-
17 explanatory. It's not hard to ---.

18 Q. You testified yesterday that Freyermuth, was he a
19 witness?

20 A. Freyermuth?

21 Q. Yeah. Freyermuth (corrects pronunciation). I'm
22 sorry.

23 A. Yes.

24 Q. Freyermuth was one of your witnesses?

25 A. Yeah. He was a better witness than most, when he

1 showed up.

2 Q. So he did not show up on certain days?

3 A. A lot, yeah. He was infrequently --- we met him
4 through a --- he was in a like a sober living facility,
5 so his boss was one of the other guys. And basically
6 he would go on intermittent binges.

7 Q. I don't know what that --- what's a sober living
8 facility?

9 A. He was basically having issues with his sobriety.

10 Q. Oh, okay. Was he in active treatment for
11 alcoholism?

12 A. I believe so.

13 Q. But you don't know?

14 A. I didn't get too much into his personal life. We
15 prayed together and I told him that I was thinking
16 about him. I felt bad for the guy. He seems like a
17 really good kid.

18 Q. So you deployed him into the field?

19 A. Yeah, we did. Definitely.

20 Q. And who was he teamed up with?

21 A. I think he was teamed up with pretty much everyone
22 at some given time. Everyone wanted to use him because
23 when he would show up, he was probably the easiest
24 going person.

25 Q. Was he a Cruz witness or was he a Rocky witness?

1 A. Rocky witness.

2 Q. So you would team him up with Rocky circulators?

3 A. Yeah.

4 Q. Did this occur in the Philadelphia area?

5 A. No, it was all in Pittsburgh.

6 Q. So when he didn't show up, what did your
7 professional circulators do?

8 A. It pretty much happened every other couple days.
9 We would have to, like I said earlier, we would put the
10 two boats on one anchor if there was an event.
11 Otherwise, they would sit in a hotel and watch the
12 Price is Right.

13 Q. Now you testified that he, along with some other
14 witnesses would actually pick up a clipboard or a foam
15 board and do some circulation for you?

16 A. Justin would. He was probably the only one that
17 actually would.

18 Q. Justin?

19 A. Yeah. They all would hold the board but none of
20 them would collect it. Justin Freyermuth.

21 Q. Oh, Justin Freyermuth.

22 A. Yeah. He would collect signatures. I tried to
23 encourage all of them, give a little hand and help the
24 coordinator out. They were all going to get a
25 commission based on every signature they got for their

1 help or they'd get paid hourly. So they'd pick up a
2 few extra signatures. I'd offer them an extra dollar a
3 signature, that kind of thing.

4 So, none of them knew how much the circulators
5 were getting, which is important because once you tell
6 them that, they start trying to be like Kennett and
7 making more money. But Justin was willing to help.
8 Even if you got a certain amount of signatures each
9 day, he wanted to be a Jake or he wanted to be a
10 traveling professional circulator.

11 Q. I think your testimony was that Justin Freyermuth
12 would get about 30 signatures a day?

13 A. He'd get sometimes 50.

14 Q. Depending on how he felt when he showed up?

15 A. When he showed up, yeah.

16 Q. And when the circulators were operating in
17 environments where they didn't have to have a witness,
18 would they get more than that 50 signatures per day?

19 A. Oh, yeah. I mean Jake was getting --- at downtown
20 public library in Pittsburgh, he was doing 250 a day
21 with Justin or Charles or whoever was witnessing.

22 And when he was with one of these guys, he'd get 250 a
23 day. Michael was getting 100 plus.

24 Q. And what was with a witness?

25 A. Yeah.

1 Q. Without a witness, what did the circulators
2 generate?

3 ATTORNEY JOEL:

4 Object to form.

5 A. Jake would do --- do I need to answer that?

6 BY ATTORNEY ROSSI:

7 Q. Let me rephrase it. You just testified that he
8 would receive --- when he circulated with a witness,
9 250 was who?

10 A. Jake.

11 Q. Jake, we've got 250 with a witness?

12 A. Yeah.

13 Q. Hang on. Who would get 100 plus with a witness?

14 A. Michael Jennings.

15 Q. Michael Jenkins?

16 A. Michael Jennings is good for around 100 a day.

17 Q. With a witness?

18 A. Yeah.

19 Q. Without a witness, what does Jake generate?

20 ATTORNEY JOEL:

21 Object to form.

22 BY ATTORNEY ROSSI:

23 Q. Based on your direct observation ---.

24 ATTORNEY JOEL:

25 Same objection. How can he know what

1 would Jake would have gotten in Pennsylvania without a
2 witness when Jake wasn't allowed without a witness?

3 ATTORNEY ROSSI:

4 In other states ---.

5 ATTORNEY JOEL:

6 Who cares what he got in another state.

7 BY ATTORNEY ROSSI:

8 Q. In other states when there is no witness in
9 another state, what was his daily production?

10 A. Like I said, he's gotten --- I've seen him get 500
11 in the Chicago subways in one day.

12 Q. And does Illinois require a witness?

13 A. No. And it has probably the same traffic as
14 downtown Pittsburgh library.

15 ATTORNEY JOEL:

16 Objection.

17 BY ATTORNEY ROSSI:

18 Q. Jennings, in Pennsylvania with a witness, he
19 generated 10 a day? Yes?

20 A. Around there. I'd probably say 75 is more
21 accurate for him.

22 Q. 75 to 100 a day?

23 A. Yeah.

24 Q. Outside of Pennsylvania without a witness, what
25 did he generate?

1 A. He'll do 120 to 140 if he works all day.

2 Q. Are there any professional circulators, based on
3 your experience, that generate more signatures with a
4 witness than without a witness?

5 A. No.

6 Q. Are there any, based on your personal experience,
7 either in Pennsylvania or out of Pennsylvania where a
8 professional circulator with a witness who carried a
9 clipboard generated more signatures as a circulator
10 without a witness?

11 A. Never.

12 Q. Were you in Pittsburgh when David Tessator
13 notarized the petitions for the first deadline?

14 A. (Indicates no).

15 Q. You did not witness that?

16 A. No, we weren't.

17 Q. When you were in ---?

18 ATTORNEY JOEL:

19 Hold on. We can go off for a second.

20 OFF RECORD DISCUSSION

21 BY ATTORNEY ROSSI:

22 Q. Let me ask the question. The only notarizations
23 that you witnessed with respect to the
24 OpenPittsburgh.Org petition was when there were no
25 witness restrictions?

1 A. That's correct.

2 Q. It was during your four-day period that you were
3 in the states, that's the only thing you witnessed?

4 A. Yeah.

5 Q. How did they do the notarizations? I mean, did
6 you have --- and I'm talking about for the
7 OpenPittsburgh.Org referendum petition when you were
8 there.

9 A. Uh-huh (yes).

10 Q. When you were there, there was no witness
11 requirement; correct?

12 A. When we were there, there was no witness
13 requirement.

14 Q. So did you still have the petitions notarized
15 every day?

16 A. No, unfortunately.

17 Q. Unfortunately. Did you recommend that they were
18 notarized every day?

19 A. Of course.

20 Q. And Dave Tessator rejected that?

21 A. Yeah.

22 Q. So the notarizations --- I think your prior
23 testimony is that they had --- they were notarized all
24 in one day, but they were stacked?

25 A. Well, let's put it this way. I'm sorry. Can I go

1 back to the question you asked ---?

2 Q. Please.

3 A. The first day I recommended it. The second day I
4 recommended it. So I was there four days. People
5 started getting in the second day and the third. So
6 basically I'd find out that we are going to need to
7 notarize --- when I found out we were going to need to
8 notarize, which was day two that I was there, that's
9 when I started recommending it every day going into the
10 state that we won that issue. So it was actually like
11 I thought we weren't going to notarize anything. And
12 then when I found out, I told them we needed to do it
13 every day. And he didn't like that because he
14 knew ---.

15 Q. I understand. So you informed --- you had
16 informed the Cruz campaign about the notarization
17 requirement?

18 A. Yeah. I told them how much it was going to cost
19 them.

20 Q. And what was their reaction to that?

21 A. They were shocked. They couldn't believe it.
22 They actually --- he said, whoa, whoa, whoa. And I
23 think those were his exact words. He said, we're going
24 to have to get back to you on that.

25 Q. David Tessator's original notary wanted seven

1 dollars a page. I'm not even joking. And that was the
2 friendly notary.

3 ATTORNEY JOEL:

4 Can you read that back? I just didn't
5 hear it. I want to make sure I got it. Thanks.

6 PREVIOUS ANSWER REPEATED

7 BY ATTORNEY ROSSI:

8 Q. So to your knowledge, their notary wasn't free?

9 A. No. The one that they brought in, I remember him
10 kind of like --- she said, okay, it's going to be seven
11 dollars a page per stamp. And I said, David --- and I
12 think I talked to him. I was like, you know, there's
13 cheaper notaries out there, man. That's kind of a lot.
14 I told him how much it would end up adding up to be,
15 and I think he --- that kind of took him aback when he
16 did the math. And then I don't know what he did. I
17 guess he talked to her and came up with a deal where
18 basically she was given a lump sum or something. I
19 don't know how it worked out.

20 Q. So at the end of the day, she didn't charge seven
21 dollars per page?

22 A. No. He made it less. I mean, that's kind of
23 ridiculous. Seven bucks is a lot. You know, for 100,
24 200 pages, and that would have killed their little
25 bank.

1 Q. So let me clean up my question here on the
2 affidavit costs. Your testimony is, just doing the
3 math, five dollars times 1,100 petition pages, it's
4 about \$5,200 filing fee --- I mean, fees to get
5 presidential nomination papers on the ballot?

6 A. Yeah. I would say at least \$5,000 is what a
7 campaign is going to spend doing the whole slate and
8 their presidential candidate. You know, it's a
9 backdoor filing fee. It is a filing fee.

10 ATTORNEY JOEL:

11 Objection.

12 BY ATTORNEY ROSSI:

13 Q. Now, Freyermuth, going back to the witness
14 Freyermuth, you paid him on a daily basis?

15 A. No, every other day. I mean, I tried not to.
16 After the first time we paid him some cash, he didn't
17 show up the next day. And I got talked to by what was
18 --- I think it was one of the other circulators for a
19 day or two. He told me basically --- whoever his
20 sponsor was basically told me what the deal was. So I
21 tried to ---.

22 Q. And what did the sponsor say?

23 A. He just --- he wanted me to be concerned and
24 careful about how much cash Justin was given, because
25 he's known to go and use it for not good things. So I

1 said, okay. And I became privy and I said --- that's
2 when I started freaking out, you know, because it's
3 just one level of stress I didn't need to deal with at
4 the time.

5 Q. Did you fire David Freyermuth for not showing up?

6 A. I didn't. I mean, I couldn't. I mean ---

7 Q. Why not?

8 A. --- it's Hobson's choice at that point. I mean,
9 you got one --- you got three guys showing up. Yqu got
10 to use what you can. I tried to inspire him and
11 motivate him to come in, and he did end up getting
12 better about it. I think by the end of the drive he
13 was showing up almost every day. But it was kind --- I
14 know some of the guys were, you know, a little bit
15 worried just about what was going on and also about
16 what the deal was.

17 Q. Do other states have notarization fees similar to
18 Pennsylvania's?

19 A. None in the nation has anything close to
20 Pennsylvania's fee.

21 Q. In your experience, what is the average notary fee
22 outside Pennsylvania?

23 A. A buck a page, that's what you'll pay max. But
24 you know, most banks --- you know, most states have
25 banks, too, you know. Pittsburgh --- you got zero

1 banks for anywhere other than Pittsburgh.

2 Q. I didn't understand what you said.

3 A. So most states also have banks you can notarize
4 in. Pennsylvania seems to be pretty intent at the bank
5 level because they know of the administrative costs of
6 the notarization to not go and do a bunch of petitions.
7 They want you to go do that at a place that you can pay
8 to do it.

9 Q. You mentioned ---.

10 A. Well, some will. I'm not saying ---.

11 Q. Hang on. Let me ask a question. You mentioned
12 Wells Fargo Bank earlier ---

13 A. Yeah.

14 Q. --- in your testimony today. Is that your bank?

15 A. That's my bank, yes.

16 Q. And if you go to Wells Fargo Bank with a hundred
17 nominating petitions --- have you ever --- strike that.

18 In your experience, will Wells Fargo Bank notarize
19 as many petitions as you present to them?

20 A. I've never experienced that because there are no
21 Wells Fargos in Pittsburgh.

22 Q. What about outside Pennsylvania?

23 A. Outside of Pennsylvania, I've never had an issue.

24 Q. They will ---?

25 A. But sometimes they --- I mean, it really depends.

1 It depends on the state. Illinois, I have been told to
2 stop. And I mean, I consider myself to be a pretty
3 good customer after this year. I think that they
4 should --- I don't think they would give me problems
5 now, but you know, I could see someone with not much
6 money or something like that going in and trying to get
7 a hundred pages and being told, hell, no.

8 Q. Well, let me ask you this. Why not pay somebody
9 to become a notary public to notarize all your
10 affidavits?

11 A. It's not a bad idea.

12 Q. Why haven't you?

13 A. Because I'm never in a state long enough. I mean,
14 they'd have to get licensed in every state in America.

15 Q. Okay.

16 A. You know, I mean, that's not fun. It's probably
17 not worth the cost.

18 Q. Presumably, that notary then would have to --- you
19 would have to pay their travel costs?

20 A. Yeah.

21 Q. So getting a --- paying and having a notary on
22 staff is not economic viable?

23 A. No. Just like having my --- I can't be at every
24 bank either. There's no Wells Fargos in Ohio. There's
25 no Wells Fargos in Kentucky. There's about 15, 20

1 states there's no Wells Fargos in. Am I supposed to go
2 get a --- become a member of every bank in the country?
3 I mean, you know, even if they will let me notarize, it
4 doesn't make sense.

5 Q. And the campaign is paying for the notaries
6 anyway; correct?

7 A. I'd charge them if I have to pay for --- I
8 generally would consider every petition company makes
9 the campaigns pay for, I would say so, unless they're
10 billing them --- I guess --- I would say --- I can't
11 generalize like that, but I would say, yeah.

12 Q. Is there ever a situation where you pay for the
13 notary and then don't get reimbursed?

14 A. Yeah. That happens all the time. I mean ---.

15 Q. Why?

16 A. Well, my petitioner loses a receipt, you know. I
17 can't make them --- a hundred dollars of notaries, but
18 if they don't have the receipt, I get mad at them, yell
19 at them. But at the end of the day, I'll try to go and
20 get that receipt by contacting them or have --- you
21 know, to figure it out or just eat it. But yeah, I
22 mean, all the time.

23 Q. So in order for you to get reimbursed for a notary
24 fee, you have to have a receipt to show a ---?

25 A. Receipts, oh, yeah. Yes.

1 Q. Why isn't it just the fact that, well, we
2 notarized a thousand pages and we filed a thousand
3 pages for you, so give me \$5,000 for the notary? You
4 don't do it that way?

5 A. No. No one would. I wouldn't do that. I
6 wouldn't reimburse those receipts. I mean, I have
7 reimbursed things without receipts, but I wouldn't if I
8 was the campaign. You know, those things are all ---
9 they're buttoned up pretty tight and, you know, they
10 have a lot of eyes on them, so they got to be pretty,
11 you know, methodical, in how they do that stuff.

12 Q. I think you talked --- you testified earlier about
13 the willingness of people to sign more than one
14 petition in your experience.

15 A. Uh-huh (yes).

16 Q. How does that --- how does a circulator get
17 somebody to sign more than one nominating petition?

18 A. Nominating paper?

19 Q. Paper.

20 A. They'd say, pardon me, sir or ma'am, are you a
21 registered voter here in Pennsylvania? If they say
22 yes, you say, great, would you mind helping us out with
23 some quick signatures to put more choices on the
24 ballot? If they say, what kind of choices or yes, you
25 explain the choices. You have Gary Johnson or William

1 Weld for the Libertarians. We have Jill Stein and ---
2 I forget the running mate, but you get the picture.
3 And then we have Rocky De Law Fuente for the Demo ---
4 or for the independent. Can you help us with some
5 quick signatures? And they'll say, yeah, sure. and
6 you give them the board and they just start signing.
7 And then they sign the first one, flip, sign the second
8 one, flip, sign the third one, flip, sign and fill out
9 all their information, of course, but -- and then it's
10 done.

11 Q. So it's a specific technique circulators have ---

12 A. Yes.

13 Q. --- to get people to sign more than one? And as
14 they're signing, they know what they're signing?

15 A. Of course. And you'll have some people --- like
16 I'd say 90 percent of the time will fill out all three.
17 When I'm doing it, even probably more than that.

18 Jake's really good at it. Most people are. They get
19 all three. But you know, some people, like if they're
20 a staunch Libertarian, they're not going to sign for
21 Jill Stein. And Jill Stein's not going to sign for
22 Gary Johnson. And then sometimes they'll get a Hillary
23 supporter and they'll want to sign for Gary Johnson to
24 hurt Trump, you know. It's all psychological.

25 Q. You circulated nominating papers for Rocky De La

1 Fuente in Pennsylvania?

2 A. Yes.

3 Q. Did you circulate any other nominating papers to
4 Pennsylvania for other candidates?

5 A. Yeah. We circulated Jill Stein and Gary Johnson.
6 And I don't know if I said this, but we did about a
7 thousand signatures for Darrell Castle. And that's
8 something that needs to be added to the record.

9 Q. Who is Darrell Castle?

10 A. He was the Constitution Party candidate.

11 Q. Were there people in Pennsylvania who signed more
12 than one nominating paper in 2016?

13 A. Yeah, multiple people.

14 Q. Okay.

15 A. Most people.

16 Q. Really?

17 A. Most people that signed Rocky signed for more than
18 one person.

19 Q. Let me go back. This is sort of a new issue. You
20 said you were waiting around on a verdict on the number
21 of signatures with respect to nominating papers in
22 Pennsylvania for 2016.

23 A. Yes. Yeah, we were. I was.

24 Q. Initially, before the ruling came down, how many
25 signatures were you prepared to get for Rocky De La

1 Fuente?

2 A. I was sweating. I thought we were going to have
3 to get about 30,000, 35,000.

4 Q. How did you learn about --- at what point did you
5 become convinced that you did not have to get 30,000
6 signatures for Rocky?

7 A. When ---.

8 ATTORNEY JOEL:

9 Objection to form.

10 A. I'm sorry.

11 BY ATTORNEY ROSSI:

12 Q. You can answer.

13 A. When the legislature --- when the Judge ordered
14 --- basically I waited, you know, like everyone else
15 kind of until that Judge ruled that the legislature
16 should make ---. And that's when I thought, whoa, man,
17 things are really going to clear up here. so instead
18 of flying a bunch of petitioners in, there was an
19 Arizona drive ending and a drive in Oregon ending.
20 Instead of flying all those guys in and just starting
21 to hit the pavement, I waited, which was the smart
22 thing to do, until after --- until about a week or so
23 of resolutions and finally getting an answer from a
24 Judge.

25 Q. What was your understanding of the number of

1 signatures required to get Rocky on the ballot?

2 ATTORNEY JOEL:

3 Object to the form. Go ahead.

4 A. Who told me?

5 BY ATTORNEY ROSSI:

6 Q. Yes.

7 A. I believe I talked to you about it first.

8 Q. Okay.

9 A. And you told me that there was actually something
10 pending with Oliver Hall and the Court, and so I went
11 --- I think we looked it up or Kara looked it up or
12 someone pulled it and we were seeing what the case was.
13 And it looked like it had some legs, so we just kind of
14 waited. And you said that there's very likely a ruling
15 going to be, and I just waited, waited and waited and
16 waited.

17 Q. Did you ever call the Secretary of State's office?

18 A. No, I don't think so. Why, did I? Or no?

19 Q. I don't know. I'm asking the question. Did you
20 call the Secretary of State's office?

21 A. No, I do not believe so. I don't believe so.

22 Q. Did you look on their website?

23 A. No.

24 Q. I believe you testified to this before. How many
25 signatures did you get for Rocky De La Fuente as an

1 independent in Pennsylvania?

2 A. Over 12,000 signatures.

3 Q. And your testimony is that you --- and you got
4 6,000 for OpenPittsburgh.Org; is that correct?

5 A. Yeah. 12,000 I think is at the high end. It
6 would probably be like 11,5, somewhere around like
7 that, 11,500 to 12,000, something like that.

8 Q. Now, Mr. Joel asked you a question as to whether
9 law enforcement has ever stopped you from collecting
10 signatures in Pennsylvania. Was there ever a situation
11 where you were --- to your knowledge, that you were
12 threatened with police action if you didn't stop by a
13 store owner or otherwise? Strike that.

14 A. Yes, there was.

15 Q. Let me strike --- let's break this down. You
16 testified that sometimes you would be told to stop
17 petitioning in a store?

18 A. Yeah, or at the front of a store.

19 Q. And did they ever say if you didn't stop we're
20 going to call the police, based on your knowledge?

21 A. Based on my knowledge, they've told our
22 petitioners that stuff, sure.

23 Q. What's the dynamic? Are you allowed to go into
24 Walmart and get signatures?

25 A. No.

1 Q. You're not?

2 A. No.

3 Q. Based on what?

4 A. Well ---.

5 Q. Why do you say you're not allowed to go into a
6 Walmart and get a signature?

7 A. Private property laws.

8 Q. But until they ---.

9 A. Sorry.

10 Q. To your knowledge, is there a state law that says
11 you can't?

12 A. No, there isn't.

13 Q. What?

14 A. No, there isn't, to my knowledge.

15 Q. So when you're stopped from circulating in a
16 Walmart, it's because the owner has asked you to stop?

17 A. Yeah, the security.

18 Q. What triggers security --- well, in your
19 experience, are you able to operate on private property
20 without a witness?

21 A. I'm confused by the question.

22 Q. Fair enough. It's a bad question. Strike the
23 question. Jake Witmer testified that he would go into
24 a Target or a Walmart to circulate ---

25 A. I think it's funny. I just laugh. I'm sorry.

1 Q. --- and that a witness loitering --- his witness,
2 if he was loitering, would trigger the store to ask him
3 to leave. Is that a common experience with your
4 circulators?

5 A. Not all of them go into Walmart, but yeah. I
6 mean, if they went into a Walmart, I would be pretty
7 dang shocked to see a witness wanting to go and follow
8 them around the store to get signatures. And I'm sure
9 that they would get thrown out very, very quickly.

10 Q. Okay.

11 A. Now, some of them do go into Walmart, especially
12 if it's bad weather. Jake's not the only one, but you
13 know, not every --- I personally wouldn't go into a
14 Walmart to get signatures.

15 Q. Ever?

16 A. Ever. I don't do that.

17 Q. So that's not a best practice?

18 A. I would consider that to be pretty aggressive, and
19 I believe in property rights and respect them, although
20 I do think that a parking lot is fair game. I can
21 easily rationalize hitting a Walmart parking lot.

22 Q. Are you more likely to be allowed to circulate in
23 a parking lot than inside the store?

24 A. Yeah. I've had security officers allow me to
25 circulate in Walmart parking lots. Some states allow

1 you to circulate in any store's parking lot.

2 Q. Pennsylvania doesn't have such a law, though;
3 correct?

4 A. No, they don't have --- it's called open access,
5 and they don't have it.

6 Q. In Pennsylvania, when circulating in the parking
7 lot, does the use of a witness cause any problems, in
8 your experience, for the owners?

9 A. Definitely.

10 Q. And how so?

11 A. Well, you know, they're not doing --- you know,
12 they're not walking around. They're not getting
13 signatures, so they're just sitting there. People get
14 worried. Security thinks that they're stealing or, you
15 know --- people --- it's a red flag to have someone
16 just standing there in a parking lot. No one wants
17 that.

18 Q. So if somebody's moving around, they're less
19 likely to be stopped by ---?

20 A. Yeah. And I tell my --- like when I'm doing it,
21 I'll actually go put up carts and I'll help the guys
22 outside. They'll see me doing work that they have to
23 do. They love it. They'll usually end up letting me
24 stay there as long as they can. They're not going to
25 go tell the security guy to kick me out.

1 Q. Fair enough. Very clever. So enough of that.
2 But ultimately, when you're told to leave a store
3 parking lot, if you don't, you risk, in your
4 experience, ---

5 A. Being there.

6 Q. --- them calling the police?

7 A. Definitely.

8 Q. And that's the limit of being --- of police power
9 being used against you with respect to stopping you
10 from circulating; correct?

11 A. Yeah, on private --- now, it's not isolated to
12 private property. A lot of people don't understand
13 public property or access rights. And this summer, for
14 instance, we had a guy call the cops on us at a street
15 festival. And what I found was --- you know, I talk to
16 the cops all the time, explain the situation. If I'm
17 there, I like to be able to intervene for petitioners.
18 I think Michael Jennings and Brian Miller and a couple
19 other guys were getting kicked out of a location that
20 was in the middle --- it was Picklesburgh Street
21 Festival. Anyway, I went and told the cop exactly what
22 we were doing, and he told the little guy that was
23 telling on us that basically we're practicing our First
24 Amendment rights, and he's going to be damned if he's
25 going to stop us. And that was pretty cool.

1 Q. Good. Good. In your experience, what is the
2 validity rate of your circulators, your professional
3 circulators?

4 A. You know, always over 70 percent. High sometimes.
5 It depends on the state, too. But you know, like Andy
6 or Jake, they're usually in the 80s plus.

7 Q. When you say Andy and Jake, Andy who?

8 A. Andy Jacobs, Jake Witmer. Milton Lucan is high.
9 I'm high. Bob Lynch. All these guys that we had for
10 Rocky De La Fuente, you know, because that was the
11 third state we had done and we were just doing Rocky as
12 a Democrat then. Those are all the core group of ---
13 you know, those had been putting the Libertarian Party
14 on the ballot for 30 years in every state in the
15 country, so you know, those guys have been --- they're
16 awesome.

17 Q. Early on in your testimony you clearly gravitated
18 to Libertarian candidates.

19 A. Uh-huh (yes).

20 Q. Let me ask you, now you've branched out. You do
21 more than Libertarian candidates now.

22 A. Of course, yeah.

23 Q. If you had to choose between a Libertarian and a
24 Green Party candidate, who would you check?

25 A. The Libertarian.

1 Q. And what if the Libertarian --- what if the Green
2 Party candidate was going to pay you more money and you
3 could only do one?

4 A. Well, you know, money is not the only thing in the
5 world. I believe in Libertarianism. I made that clear
6 in my testimony. I probably wouldn't be doing this if
7 I wasn't a Libertarian. I believe strongly in the
8 message and liberty, so yeah, I would work for them
9 over the Green, even if it was more money.

10 Q. But if you can do them all, you would do them all?

11 A. How much more money? I'm just kidding.

12 Q. If you could do them all, you will do them?

13 A. Definitely.

14 Q. But you have limited resources sometimes; correct?

15 A. Everyone does, yeah.

16 Q. And if the Libertarians ask you to circulate and
17 you could only --- you only had enough to do one
18 petition drive and you had to choose between a
19 Libertarian candidate and others, you would choose the
20 Libertarians?

21 A. Of course.

22 Q. And there are some candidates you won't circulate
23 for; correct?

24 A. Yeah.

25 Q. Under any circumstances?

1 A. Yeah. I wouldn't circulate for Hillary. My guys
2 circulate for Trump. I don't really care for him, you
3 know. Hitler, Stalin, those types.

4 Q. I mean, seriously.

5 A. I wouldn't circulate for Bernie Sanders. I
6 wouldn't circulate for Hillary. I wouldn't circulate
7 for a lot of candidates probably.

8 Q. So ---.

9 A. I'm very selective. I don't just go with
10 everyone.

11 Q. Who you're willing to circulate for is cabined by
12 your political beliefs?

13 A. Yeah, it definitely has a lot to do with it.

14 Q. But as part of your exercise, you're willing to
15 make a profit?

16 A. Sure.

17 Q. Based on your circulation efforts this year, ---

18 A. Yep.

19 Q. --- did you make more or less money in
20 Pennsylvania relative to other states?

21 A. In Pennsylvania, did I make more or less money
22 relative to the other states? Well, I had three ---
23 four contracts in Pennsylvania. So assuming the
24 Libertarian Party doesn't stiff me and I did get paid
25 --- I mean, I probably made a little bit more here.

1 But I mean it's really relative to what you're talking
2 about. Here, in general, did I make --- did I have
3 more contracts in Pennsylvania than anywhere else, yes,
4 I did.

5 Q. On a daily basis --- strike that.

6 Did the requirement --- did the in-state witness
7 requirement reduce your profits in Pennsylvania?

8 A. Oh, okay. We're talking about the witness ---
9 we're talking about the Democratic ---?

10 Q. Yes.

11 A. Okay. Sorry. So I need to clarify that. If
12 we're talking about the Democratic primary, did that
13 reduce my profits, well, on a daily basis, yes, because
14 the job was spread out over a lot more days. So I was
15 only able to get a certain amount of signatures each
16 day, you know. If we eliminated that, I would have
17 gotten the job done and been able to focus completely
18 on Cruz and probably knocked out more districts.

19 Q. And when you say eliminated that, eliminated what?

20 A. What? If we eliminate the in-state circulator
21 requirement, then, you know, I get Rocky done in three
22 days and I can move on to the other ones, start helping
23 Trump in all the districts. I could have probably
24 gotten ten times as much money and work done.

25 Q. So the number of signatures you get today in a

1 day, without doing the state --- without --- excuse me.
2 I'm getting tongue-tied. I apologize. Strike that.

3 So the number of signatures you could get per day
4 would be closer to what you did for OpenPittsburgh.Org?

5 A. Sure. At least half of that per day. I mean, I
6 used to do half of that per day with our manpower. And
7 you know, Rocky might have needed about 4,000 to 5,000
8 signatures. I could have gotten that done in two or
9 three days with the guys I have in the state.

10 Q. Let me ask you something. Why not --- how long
11 does it take to train somebody to become proficient at
12 being at circulator?

13 A. I mean, I was training people in a day here in
14 Pittsburgh, but --- or in Pennsylvania, the cycle, over
15 the summer. However, to be --- the definition of
16 proficient is pretty variable. I mean, if you wanted
17 to be a circulator, I could train you in a day. If you
18 want to be a good circulator, you know, it can take
19 years, really. I mean, some of these guys, they learn
20 new tricks every other day.

21 Q. So it's a trial and error kind of training?

22 A. Yeah. You know, anyone can do it and start off
23 and make some money, but not everyone's going to make,
24 you know, enough money to live off of.

25 Q. So to become a Jake Witmer takes several years?

1 A. Yeah. And I think Jake --- you know, Jake and
2 Andy and those guys --- like Jake's really good, you
3 know. And if he could work every day at his full
4 capacity, he'd probably be making a few hundred
5 thousand dollars a year. Petitioning's not --- it's a
6 seasonal job, too, and not everyone wants to do it, you
7 know, full time. I trained a couple all right guys
8 that seem to be semi-decent in Pennsylvania from the
9 Craigslist. It's just not something that --- it's not
10 very common.

11 ATTORNEY ROSSI:

12 I'm done.

13 ATTORNEY JOEL:

14 I've got more.

15 ATTORNEY ROSSI:

16 I know you do.

17 ATTORNEY JOEL:

18 Do you need a break?

19 A. You all want to go through?

20 ATTORNEY ROSSI:

21 I'm okay to go if you guys want to go.

22 A. Yeah, that's fine, because ---.

23 RE-EXAMINATION

24 BY ATTORNEY JOEL:

25 Q. I want to make sure I understand a few things.

1 With the Cruz campaign in Pennsylvania, did Cruz only
2 contract with you to collect signatures for delegates?

3 A. No, he contracted for both.

4 Q. Because I thought you said yesterday that you
5 collected signatures for him as a candidate and also
6 for his delegates; is that correct?

7 A. Yes.

8 Q. Am I correct that you were not the only business
9 or collection outfit in the Commonwealth collecting for
10 Cruz?

11 A. I don't know the answer to that question. I
12 believe I was, but I'm not a hundred percent.

13 Q. So do you think you were the only ones who
14 collected for Cruz to get him on the ballot?

15 A. I think we were, yeah. Yeah, Dave probably would
16 have mentioned something. I don't know, though. I
17 couldn't answer that question. I'll find out.

18 Q. Did you get Cruz enough signatures to get him on
19 the ballot?

20 A. We supplemented them, supplemented.

21 Q. What does that mean?

22 A. Well, we were only in charge of a few
23 congressional districts, so they had volunteers getting
24 a lot of stuff, too.

25 Q. So maybe my question was a bad one then. So for

1 Cruz in Pennsylvania, you think you might have been the
2 only professional outfit collecting signatures?

3 A. Yes.

4 Q. But there were other Cruz volunteers spread out
5 throughout the Commonwealth getting him signatures to
6 get on the ballot?

7 A. Definitely.

8 Q. And getting his delegates on the ballot?

9 A. Definitely.

10 Q. Cruz got on the ballot in Pennsylvania?

11 A. He did.

12 Q. And Cruz's delegates got on the ballot in
13 Pennsylvania?

14 A. Not all of them.

15 Q. Did he get delegates in every district?

16 A. Not that I know.

17 Q. Do you know what other districts he didn't get a
18 full slate of delegates on?

19 A. I'm pretty sure a few of them.

20 Q. And just remind me. What was the --- the district
21 you were dealing with was in Bucks County; correct?

22 A. So that district I know he didn't get a full slate
23 of delegates.

24 Q. And by full slate, you would mean just the three
25 delegates or the three and the alternate?

1 A. Full slate I'm using as the ones he had contracted
2 me for, for three delegates.

3 Q. For the three, not for the alternate?

4 A. Yeah, because that's ---.

5 Q. You weren't contracted to get alternates at all?

6 A. Not for Cruz. They wanted them. They just --- no
7 one had --- they didn't have the number of people
8 interested, I mean ---.

9 Q. So in that district, if I understood you
10 correctly, one delegate made it on?

11 A. Yes.

12 Q. And that was at least in part from your efforts
13 and also in part from whatever the volunteers the Crus
14 campaign had in that district?

15 A. Exactly.

16 Q. And were there other districts --- and so in that
17 district, one out of the three --- Cruz only had one
18 out of three delegates in that district?

19 A. Yep.

20 Q. Despite your efforts and despite the efforts of
21 whatever volunteers Cruz had in the area doing that?

22 A. Yes.

23 Q. Were there other congressional districts that Cruz
24 similarly did not get three delegates?

25 A. Yeah. I believe there were quite a few.

1 Q. I take it by your testimony none of those were
2 ones that you were working in?

3 A. Just because we didn't have the manpower. I think
4 that they would have liked me to do the whole state if
5 I could have done it. That was my --- that was how
6 they --- that was my intimation from the Cruz campaign.

7 Q. That's all well and good, but that wasn't my
8 question.

9 A. Okay. Sorry.

10 Q. That's fine. It just shows it was a bad question.
11 It's not fault, it's my fault for doing a lousy
12 question. Let's try it this way. Can you identify for
13 me what other districts Cruz didn't get a full slate of
14 delegates?

15 A. I couldn't without talking to Vonne. She could
16 answer that. If you all reach out to her, I'm sure she
17 would.

18 Q. And you were collecting and responsible for Cruz
19 in --- I think you said five districts?

20 A. Originally.

21 Q. And then what happened? Did it expand or
22 contract?

23 A. Well, it contracted. The contract contracted
24 based on my experiences in the state.

25 Q. So there are 18 congressional districts in the

1 Commonwealth?

2 A. Yes, sir.

3 Q. And you started out being for five?

4 A. Yep.

5 Q. So out of the other 13, did any of them not get
6 full Cruz delegate slates? That's what I'm trying to
7 understand, to your understanding.

8 A. Yes.

9 Q. Okay.

10 A. I know they didn't.

11 Q. Okay.

12 A. I think the total number, I believe --- if you
13 want me to answer the total number?

14 Q. Sure.

15 A. I think that there was a total of about 20
16 delegates when you can have up to 54. So do the math.

17 Q. With De La Fuente as a Democrat, the Sean person
18 had the exclusive contract, if I remember correctly?

19 A. Yes.

20 Q. And then Sean subcontracted some of that work to
21 you?

22 A. Well, he had another guy here. And I don't know
23 what happened, but I was --- basically I took over that
24 role, I'm pretty sure.

25 Q. So is it your understanding that you ended up

1 doing all the work for Rocky in the Commonwealth?

2 A. Yeah, that's what ---.

3 Q. As a Democrat?

4 A. I understood that to be true.

5 Q. And I think you said this yesterday, but you were
6 just getting signatures for Rocky to get on the ballot;
7 correct?

8 A. Yeah. He didn't want delegates.

9 Q. He didn't want any delegates. And you succeeded
10 in getting him enough signatures to get him on the
11 ballot?

12 A. Yes, sir.

13 Q. Now, you mentioned going door to door in the
14 Democratic and Republican Primaries because you have
15 lists, you know where the targets are, that sort of
16 stuff. You remember that?

17 A. Yes.

18 Q. You also described sort of being out in an open-
19 air area and acting like a salmon going through the
20 crowds of people, following them around, trying to get
21 signatures?

22 A. Yep.

23 Q. That salmon issue isn't in play when you're going
24 door to door; correct?

25 A. That's true.

1 Q. You talked a little bit about what your pitch was,
2 trying to build a rapport with the potential signer,
3 breaking the ice, that sort of thing. Do you remember
4 that?

5 A. Yes.

6 Q. And all of those questions are asked by the
7 circulator and not by the witness; correct?

8 A. Yeah.

9 Q. And they're all asked before the proposed signer
10 either says, yes, I'm going to sign or, no, I'm not
11 going to, those prefatory questions you talked about?

12 A. Yes. But sometimes people come to the door and
13 tell you to get off your property before even hearing
14 what you say. That's what I think that was referring
15 to. But yeah, of course the questions are going to
16 come before they give you an answer, generally.
17 Generally.

18 Q. Now, you mentioned the psychology about supporting
19 candidates, and some folks are staunch supporters of
20 certain candidates and not other candidates. I think
21 you mentioned Mr. Moll would never circulate for Mr.
22 Trump. Was I accurate?

23 A. I believe that was what he told me.

24 Q. So isn't it also true that there could be some
25 people who you approach, and if you're approaching for

1 Cruz they would say I'm not supporting Cruz, I'm not
2 going to sign your petition?

3 A. It's definitely possible.

4 Q. And in fact, that could be a way for, let's say, a
5 Cruz supporter to deny Mr. Trump a signature and
6 thereby do his or her part to deny Mr. Trump the
7 ability to get on the Pennsylvania ballot?

8 A. I'm sorry. Can you repeat that?

9 Q. Sure. Sure. If I'm a Cruz supporter, ---

10 A. Uh-huh (yes).

11 Q. --- and I will --- you acknowledge that there
12 could be some Cruz supporters, some supporters for any
13 candidate who'd say I'm only signing for that
14 candidate, I'm not signing for anybody else?

15 A. Of course.

16 Q. And that could be their way --- if you come to me
17 and are circulating for Trump and I say no, that could
18 be my way of trying to deny Mr. Trump the ability to
19 get on the ballot ---

20 A. Yep.

21 Q. --- by not giving him my signature?

22 A. That's a good --- yep. That makes sense.

23 Q. And in your experience, people do that?

24 A. Yeah.

25 Q. You talked about witnesses, and I think it was in

1 reference to having the witness with two circulators in
2 sort of the open-air market idea, that the witness is,
3 under the law, supposed to actually witness the
4 signature being signed so they can attest on the
5 affidavit?

6 A. Yes.

7 Q. If you don't have the witness, you, as the
8 circulator, are supposed to watch that signature
9 happening; correct?

10 A. That's exactly right.

11 Q. I mean, otherwise, you're lying when you sign the
12 affidavit?

13 A. That's correct.

14 Q. So if you have 15, 20, 30 boards, you have to be
15 watching all of those as well?

16 A. Yes. I wouldn't do 30 boards, but you know ---.

17 Q. I think you mentioned as many as 15.

18 A. Fifteen (15), yeah. I think 15 is probably the
19 most I'd ever do.

20 Q. And some of your folks aren't --- what's the word,
21 aren't as adept as you are and don't feel they ca
22 handle more than like four boards?

23 A. Well, some --- I mean, some --- it depends. It
24 really depends.

25 Q. All depends on the person?

1 A. The person's comfort level, yeah.

2 Q. Now, with OpenPittsburgh, I just want to make sure
3 I have all the numbers right. You had I think you said
4 25 circulators?

5 A. I believe so.

6 Q. And you got about 6,000 signatures?

7 A. 6,000 --- yeah, somewhere around there.

8 Q. And you got all of those notarized?

9 A. Yes.

10 Q. And you ensured, to the best of your ability, that
11 you weren't having people sign the petition twice?

12 A. Yeah. As part of their qualification they knew
13 that they couldn't sign it twice.

14 Q. And that took you --- what was it, four days,
15 three days?

16 A. Four days. Three days of circulation, four days
17 at the end of the state.

18 Q. So actually three days to circulate?

19 A. Yeah. I'd have to look at the actual signature
20 gathering, but I think it was three days.

21 Q. Now, for Cruz as a Republican on the primary, just
22 remind me, how many days were you in the Commonwealth
23 for that?

24 A. I think about two weeks. Less than two weeks.

25 Q. And you got how many total signatures? Was it

1 like 4,000 or something?

2 A. No. It was less than that.

3 Q. 3,000?

4 A. Less than that. It would be like probably a third
5 of what we got for Rocky. Probably --- it was probably
6 300. Well, actually, because you're getting, you know,
7 --- yeah, it might have been. It might have been close
8 to about 2,500.

9 Q. And how many people did you have circulating?

10 A. We had just those three districts, you know.

11 Q. So three people?

12 A. Well, yeah, three --- three different teams. Some
13 of them were three-man teams. Probably six to --- six
14 to seven, eight people.

15 Q. And am I correct that for the Cruz nominating
16 petitions the only people who can legally sign are
17 registered Republicans?

18 A. Cruz, yes, that's correct.

19 Q. And for Rocky as a Democrat, how many days were
20 you in the Commonwealth to do that?

21 A. About, you know, 15.

22 Q. And how many circulators did you have working that
23 project?

24 A. About 10 to 12.

25 Q. And how many signatures did you get for him as a

1 Democrat, about 4,000?

2 A. 5,000-ish. 4,500 I think is what we billed for.

3 Q. And the people who could legally sign the Rocky as
4 a Democrat petition had to be registered Democrats?

5 A. That's correct.

6 Q. And the folks who signed Rocky as an independent
7 could be Democrat; correct?

8 A. Uh-huh (yes).

9 Q. Yes or no?

10 A. Yes, sir. Yes.

11 Q. And they could be Republican?

12 A. Yes.

13 Q. They could be Libertarian?

14 A. Yes.

15 Q. They could be Green?

16 A. Yes.

17 Q. They could be Constitution?

18 A. Yes.

19 Q. They could be the American Delta Party?

20 A. That's true.

21 Q. They could be the Working Families Party?

22 A. That's true.

23 Q. Could they sign if they weren't affiliated with
24 any party, as long as they were just 18 years old, able
25 to vote?

1 A. No.

2 Q. So they have to be affiliated with some party.
3 But once they're registered to vote for whatever party,
4 it's your understanding they can sign for Rocky as an
5 independent?

6 A. Yes.

7 Q. And the Cruz --- getting back to the Cruz folks,
8 did those signatures not only have to be of Republican
9 voters, but do they have to be of Republican voters
10 within that congressional district?

11 A. They had to be in the CD, the congressional
12 district.

13 Q. And how about with Rocky as a Democrat, did they
14 not only have to be Democrats, but they had to be
15 Democrats within that congressional district?

16 A. No. Rocky as a Democrat --- well, back to the
17 Cruz question. They had to be within the CD, within
18 the county and the CD.

19 Q. Okay.

20 A. Because it was separation by county. And then
21 back to Rocky, no, they could be anywhere in the state
22 as long as they're in the county listed in the
23 petition.

24 Q. What do you mean in the county? That they're
25 physically in the county during the signing or that's

1 where they live?

2 A. That's where they live, in the county listed in
3 the petition, at the ---.

4 Q. So there wasn't any congressional district
5 parameters on Rocky as a Democrat?

6 A. Not on the at large statewide. Not on the
7 presidential statewide.

8 Q. Got it. Got it.

9 A. It's at large.

10 Q. And for Cruz, to put Cruz's name on it, could that
11 be anywhere?

12 A. They could be anywhere in the ---.

13 Q. So it's only the Cruz delegates that had to be
14 within the congressional district?

15 A. Yes, sir.

16 Q. All right. Now, you mentioned other signature
17 collections efforts in Pennsylvania. You mentioned the
18 Green and the Libertarian and I think also the
19 Constitutional Party. Did you collect for those
20 candidates or parties or what was that ---?

21 A. The Constitution Party. Yeah, they contracted us
22 like late on, like the last couple days.

23 Q. The last couple days of the collection period?

24 A. Yeah, like the last week. I had forgotten about
25 them.

1 Q. And how many signatures did you collect for them?

2 A. I think we got like a thousand.

3 Q. How long were you in the Commonwealth doing it?

4 A. A week, five days. I can't remember.

5 Q. And how many circulators did you have?

6 A. I think it was just actually Michael Jennings.

7 Q. How about the Green Party, when did you do that
8 collection?

9 A. We did that collection --- you know, I believe
10 that probably we started early, about late June, early
11 June, and then we went to about the 21st of July.

12 Q. And how many signatures did you collect?

13 A. About 5,000. I think it was 4,500. Then Andy was
14 supposed to turn in with us. He ended up turning in
15 directly, so it was about --- we should have got about
16 5,000 plus, but we ended up getting about 4,500,
17 something like that.

18 Q. And how many circulators did you have in the
19 Commonwealth for that?

20 A. You know, I can't remember. The list is ---
21 that's going to be similar to what was circulated for
22 Rocky during those time periods. Probably 20.

23 Q. And how about the Libertarian Party, what ---?

24 A. We only ---. I'm sorry.

25 Q. No, sorry. When were you in the Commonwealth

1 circulating for them?

2 A. Late June to early July.

3 Q. So a couple of weeks or ---?

4 A. Yeah, just a couple weeks at the very beginning of
5 our signature collection.

6 Q. And how many signatures did you get?

7 A. We got him about 1,500.

8 Q. And how many circulators did you have in the state
9 working there?

10 A. Probably 10 to 15. Ten to 15, maybe 20. I can't
11 remember the total number. It was --- a lot of the
12 people we would just train them. They were brand new.
13 I hadn't brought in many pros, so it was probably just
14 a small number.

15 Q. When you were talking about Open Pittsburgh, you
16 mentioned something along the lines with Mr. Tessator,
17 that he didn't like it, doing it, didn't want to
18 notarize every day, and you laughed, and didn't like
19 it. What did you mean by that?

20 A. Well, I didn't laugh. I just --- I asked him if
21 we could just to make the process quicker, once I found
22 out about the notary and the process --- he hadn't even
23 figured out the process, so it was going to be --- I
24 could tell it was just going to be a little
25 disheartening. I kind of dropped it. I was still ---

1 what I didn't want was, you know, 30 people showing up
2 to notarize all on the same day and us going on, you
3 know. It would just slow everyone down. It really
4 did. Or even having a certain subset of people
5 notarizing one day, these four notarize the other, just
6 until we kind of get in the groove. And then I
7 realized he didn't have a notary even lined up, so ---.

8 Q. But they eventually all got notarized?

9 A. They did, yeah. That was good. We got them all
10 notarized.

11 Q. And you mentioned that individual who would charge
12 you 40 bucks to come to wherever you were located.

13 A. Uh-huh (yes).

14 Q. I'm assuming that's \$40 total, that wasn't \$40 per
15 notary?

16 A. \$40 total for --- yeah, for him showing up.

17 Q. So his travel time was \$40 and then he charged \$5
18 for every notary stamp that he provided?

19 A. Yeah. I think it was a \$20 service fee plus a
20 mileage fee. And I don't know what the mileage fee
21 was, but it was always a fee. Even when we showed up
22 to his house and he didn't have to drive, there was
23 still a \$20-plus service fee on there.

24 Q. But that was total, that wasn't per stamp?

25 A. No, that was total.

1 Q. The work you did for Rocky as an independent and
2 the Green Party and the Libertarian Party and the
3 Constitution Party, that was all geared towards getting
4 those candidates on the general election ballot;
5 correct?

6 A. Yes.

7 Q. The work you did for Rocky as a Democrat and Cruz
8 as a Republican was geared towards getting them on the
9 primary ballot?

10 A. Yes.

11 Q. You mentioned Pickle Street. I think you told me
12 this before, but that's in Pittsburgh?

13 A. It's a Picklesburgh Festival. I mentioned that a
14 couple times just as an example of an event.

15 Q. And that's in Pittsburgh?

16 A. Yeah. It's an event that they have. Everyone
17 eats pickles.

18 Q. Now, you were asked a question about your
19 political leanings, and the example was Green versus
20 Libertarian.

21 A. Uh-huh (yes).

22 Q. If the Libertarians quoted you a price that did
23 not allow you to make any profit at all, you would lose
24 money, but the Greens quoted you a price that would
25 allow you to make a profit, would you opt for the

1 Greens?

2 A. It depends. I mean, I can't say one way or the
3 other. It depends like what the --- the chance of them
4 winning or things like that, but I wouldn't just
5 automatically go where the money is. That's not how
6 I'm operating my business.

7 Q. The notary you were talking about that we were
8 just talking about with the \$40 --- or that's what you
9 estimated as the travel fee and that sort of stuff,
10 just remind me, was that for the Rocky as an
11 independent collection drive or was that the Open
12 Pittsburgh?

13 A. That was Open --- no, that was the Rocky as a
14 Democrat.

15 Q. Oh, that was Rocky as a Democrat?

16 A. Yeah. And we couldn't get a hold of him. I tried
17 calling the guy or tried calling the boss, because
18 there was no other notaries really available, but we
19 had more time.

20 Q. But as I recall your testimony, the Rocky as a
21 Democrat all were properly notarized; correct?

22 A. Yeah, to my knowledge.

23 Q. And that fee was just passed straight through to
24 the Rocky campaign?

25 A. Yeah, we passed it through.

1 Q. And I'm sorry, I think I mixed it up. Rocky as a
2 Democrat were all notarized?

3 A. Yes.

4 Q. And that was passed through to them?

5 A. Yes. I thought that's what I just answered.

6 Q. Yeah. I'm just confusing myself. And Cruz as a
7 Republican, all were properly notarized to your
8 knowledge?

9 A. Uh-huh (yes).

10 Q. And that was incorporated into the price for
11 signature that you charged Cruz?

12 A. No. There was a separate account for
13 notarizations.

14 Q. But that was paid by the campaign, not by your
15 company?

16 A. I didn't have to pay for it.

17 Q. You mentioned that you trained a couple of people
18 in Pennsylvania who you got off Craigslist. Who are
19 those?

20 A. For what?

21 Q. To be circulators.

22 A. To be circulators?

23 Q. Yeah.

24 A. Oh, man. I mean, their W-9s are in the W-9 folder
25 of that flash drive.

1 Q. You were making some kind of comment about Mr.
2 Witmer and you started laughing. That probably doesn't
3 help you too much, but I'm just trying to figure out
4 what you found so funny about Mr. Witmer.

5 A. Oh, going into a grocery store.

6 Q. Oh, that was it.

7 A. I find it humorous that he does that. I don't,
8 you know. It's not something that I would do.

9 Q. Why not?

10 A. I just --- I think --- like I said earlier, I
11 think it's not a --- I mean, I wouldn't --- I would not
12 feel comfortable doing it even in bad weather. We
13 don't tell our people to do that. If he feels
14 comfortable to do it, he can do it, but ---.

15 ATTORNEY JOEL:

16 That's all I have.

17 ATTORNEY ROSSI:

18 Can I have one quick follow-up? There's
19 actually an area that I completely neglected, and it's
20 going to be real short. It has to do with Carol Love,
21 so --- I think it will actually help for tomorrow.

22 RE-EXAMINATION

23 BY ATTORNEY ROSSI:

24 Q. Are you aware that you were --- you were planning
25 --- after the hearing on the preliminary injection you

1 were planning to go to Lancaster County; correct?

2 A. Yes, we were both going.

3 Q. And I was going to take you down; correct?

4 A. Yep.

5 Q. Are you aware that I had at least one person lined
6 up to sign your nominating paper?

7 A. Yes, you told me this.

8 Q. Were you planning to take blank petitions with
9 you?

10 A. We were going to take a Cruz and a Paul petition.

11 Q. And any other blank petitions?

12 A. Yeah. We were going to take --- I think she
13 wanted to sign Rubio.

14 Q. Yeah. Okay. So did you have any discussions with
15 Carol Love about this in advance?

16 A. No.

17 Q. Have you had any discussions with Carol Love ---

18 A. No.

19 Q. --- at all, ever?

20 A. Never.

21 Q. It's your understanding you were simply going to
22 get her signature on a petition paper and then she
23 would be done?

24 A. Yes.

25 Q. That's all for that. Oh, and did you actually go

1 down to Lancaster County to get her signature?

2 A. No, because we were waiting --- we waited for the
3 night, for the injunction. And nothing happened, and
4 we just basically all went back to our places.

5 Q. Do you have any witnesses in Lancaster County to
6 witness her signature?

7 A. No.

8 Q. Which is why you didn't go down to Lancaster
9 County to get her signature?

10 ATTORNEY JOEL:

11 Objection.

12 ATTORNEY ROSSI:

13 Fair enough.

14 BY ATTORNEY ROSSI:

15 Q. Why did you not go down to Lancaster County to get
16 her signature?

17 A. Because the injunction was going to be issued ---
18 or because I believed that the injunction was going to
19 be issued based off of our conversations. I didn't
20 know what was going to happen.

21 Q. I thought we were going to get it, but we didn't.
22 His fault.

23 A. Some good arguing.

24 ATTORNEY ROSSI:

25 You did a good job that day, Mr. Joel.

1 BY ATTORNEY ROSSI:

2 Q. One more quick follow-up. The ability of a
3 professional circulator to eyeball 12 or 13 boards, ---

4 A. Uh-huh (yes).

5 Q. --- in your experience, can you do that as a
6 professional circulator?

7 A. Oh, of course. Bobby Fischer could play chess
8 against 30 people.

9 Q. Okay. Fair enough. So and it's your experience
10 that you could do it; yes?

11 A. I can definitely do it.

12 Q. And you actually eyeball all the signatures while
13 they're being ---?

14 A. And I'll read each one their name and address out
15 after they do it.

16 Q. Can a witness do that?

17 A. Not usually, no.

18 Q. When you testified that some people were limited
19 to four, who are those people who are limited to four
20 boards?

21 A. I'd say like Michael Jennings. He doesn't feel
22 more comfortable --- he won't stack and he'll carry
23 like one or two boards. Bob Lynch will only carry one
24 board, one of each. He'll do a clipboard. Mark
25 Gailey, the same thing. But they still produce good

1 numbers, you know.

2 Q. And when you say stack you mean what?

3 A. I mean, stack the petitions. I don't know if you
4 guys have this explanation, but basically what we do is
5 we put one petition on top of the other on top of the
6 other, so it's easier for the voter to sign and flip,
7 sign and flip and sign and flip. They know what
8 they're signing, everything's done correctly, but at
9 the same time it's a lot easier for us to give them one
10 board and a pen so they can go through the whole
11 process, and we're watching them do that, rather than
12 asking me for another board. And then it takes me away
13 from talking to someone else or trying to get another
14 person ---.

15 Q. And when you refer to petition you mean a petition
16 for a different candidate?

17 A. Well, like Cruz and his three delegates. That's a
18 good example. So you have Cruz, Delegate One, Delegate
19 Two, Delegate Three. They wanted to sign for Cruz and
20 his delegates. You hand them the board, they sign and
21 flip and give it back.

22 Q. And your testimony is that you circulated for the
23 Greens, Libertarians and Constitution Party for their
24 nominating papers. Did you stack those?

25 A. Not all at once. We never had all three --- all

1 the contracts. Sorry to cut you off.

2 Q. In other states have you done that?

3 A. Not --- I never had all four of them at once.

4 That'd be pretty nice. But I have stacked upwards of

5 --- I think the most I've ever stacked is usually

6 three.

7 Q. So in other states, were you ---?

8 A. Actually, that's not true. When we did Rand Paul

9 we did seven petitions stacked.

10 Q. And what do you mean by that?

11 A. Like he would have three delegates, three

12 alternates and a petition.

13 Q. But I'm talking about other candidates, candidates

14 who aren't related to each other. In other states

15 where you're allowed to get more than one signature,

16 have you ever stacked ---

17 A. Yep.

18 Q. --- the Libertarians and the Greens or --- and the

19 Constitution Party or some combination thereof?

20 A. Yes.

21 Q. And that's how you do it?

22 A. Yeah. Rocky's in there, too.

23 Q. Do you attribute the lower signature totals for

24 the Cruz and Rocky campaign in 2016 to the requirement

25 that they be --- you could only find registered voters

1 in the party?

2 A. Yes.

3 Q. So that's the reason for the lower totals?

4 A. Of course. For our lower output?

5 Q. Yes.

6 A. On a day-to-day basis, yeah, because we only have
7 --- no, no. For me being able to find registered
8 voters of the parties to follow me around, yes, not for
9 me to find voters. The voters are going to be ---
10 that's going to be constant, right, because I'm still
11 going to be able --- well, it's not going to be
12 constant. It's going to be --- assuming my witness is
13 with me, I'm going to be able to find just as many on a
14 day that I have a witness or a date I don't need a
15 witness; right? Correct? Does that make sense?

16 Q. So your testimony is that the lower production
17 total is because you can't find witnesses to go around
18 with your circulators?

19 ATTORNEY JOEL:

20 Objection. That's not what he said.

21 BY ATTORNEY ROSSI:

22 Q. Well, what is it you said? Explain.

23 ATTORNEY JOEL:

24 I'd like him to say it instead of you.

25 A. My testimony ---

1 ATTORNEY JOEL:

2 Stop leading him.

3 A. --- my testimony is that I have --- that my output
4 is going to be limited due to us not having the
5 registered voters necessary to send each one of our
6 petitioners out with a witness. That's the only reason
7 our signature output would be limited.

8 BY ATTORNEY ROSSI:

9 Q. Now, the other thing, OpenPittsburgh, the notarize
10 --- how did they notarize the Open Pittsburgh papers
11 for the referendum petitions? Did they notarize each
12 page or ---?

13 A. Yes.

14 Q. They did?

15 A. Yes.

16 Q. Okay.

17 A. And I --- David thought that there was a way of
18 doing a booklet notarization. I didn't know anything
19 about this. I was kind of skeptical and worried, and
20 we stopped talked about it. I didn't look up the
21 Election Code, I was too busy, but he says it's in
22 there. Maybe off the record you all can tell me if
23 that's legal or not.

24 Q. I'm going to speculate.

25 A. But that's --- we were supposed to do --- he

1 wanted to do it that way and I convinced him, I think,
2 or I told him that it's probably not a good idea.

3 Q. So you convinced him to notarize each petition
4 page?

5 A. I told him that we needed to. If that's what the
6 requirement was by the law --- or by the Judge, then we
7 needed to do it that way.

8 ATTORNEY ROSSI:

9 Thank you. That's all I have. Do you
10 have anything else?

11 ATTORNEY JOEL:

12 No.

13 A. Thanks, guys. We'll see you all.

14 ATTORNEY JOEL:

15 Do you want to read and sign?

16 A. Yes. Read and sign?

17 ATTORNEY ROSSI:

18 Yes.

19 * * * * *

20 DEPOSITION CONCLUDED AT 3:23 P.M.

21 * * * * *

22

23

24

25

1 COMMONWEALTH OF PENNSYLVANIA)

2 COUNTY OF BEDFORD)

3 CERTIFICATE

4 I, Bernadette M. Black, a Notary Public in
5 and for the Commonwealth of Pennsylvania, do hereby
6 certify:

7 That the foregoing proceedings, deposition of
8 Treton Pool was reported by me on 09/28/2016 and that
9 I, Bernadette M. Black, read this transcript, and that
10 I attest that this transcript is a true and accurate
11 record of the proceeding.

12 That the witness was first duly sworn to
13 testify to the truth, the whole truth, and nothing but
14 the truth and that the foregoing deposition was taken
15 at the time and place stated herein.

16 I further certify that I am not a relative,
17 employee or attorney of any of the parties, nor a
18 relative or employee of counsel, and that I am in no
19 way interested directly or indirectly in this action.

20
21 **COMMONWEALTH OF PENNSYLVANIA**

Notarial Seal

Bernadette M. Black, Notary Public
Everett Boro, Bedford County
My Commission Expires Jan. 17, 2017

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Bernadette M. Black
Bernadette M. Black,

Court Reporter

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